

Privacy Policy
Last updated January 2012

- **Information we collect and how we use it**

- Personal Information

- You may choose to provide personal information (such as your name, address, telephone number and email address) on this web site or in communication with us. Here are some of the ways you may provide the information and the types of information you may submit. We also tell you how we may use the information.

- Contact Us

- If you email us through the “[Contact Us](#)” link on this site, we ask you for information such as your name and email address so we can respond to your questions and comments. You may choose to provide additional information as well.

- Investor Communications E-mail Alerts

- If you would like to receive company news alerts from the UPAL Investor Communications Staff, we ask for your name and email address so we can send you the news alerts.

- Questionnaires and Surveys

- We occasionally conduct client surveys. We occasionally may ask visitors to our web site to complete online surveys and opinion polls about their activities, attitudes and interests. These surveys help us serve you better and improve the usefulness of our site. In conducting these surveys we may ask you for your name and email address. We do not keep any personal information about you in connection with your participation in a survey unless you specifically agree to provide that information.

- Send Content to a Friend

- You can send certain content to your friends. To do so, we ask you to provide your name and your friend’s email address. We use this information to send the content to your friend.

- Request Electronic Delivery of Annual Reports

- If you are a UPAL shareholder and would like to request electronic delivery of annual reports, you may do so on our web site. We ask for your last name and your UPAL account number for verification purposes.

- Contact UPAL’s Board of Directors

- Elsewhere on this web site, we provide a [phone number](#), a [postal address](#) and an [email address](#) so visitors can report complaints about UPAL accounting, internal accounting controls or other matters or other concerns to the board of directors. If you email us, please be aware that you will be providing us with your email address and any other information you include in your email.

- **Non-Personal Information**

- We collect certain aggregate and non-personal information when you visit this web site. Aggregate and non-personal information does not relate to a single identifiable visitor. It tells us such things as how many users visited our site and the method accessed. By collecting this information, we learn how to best tailor our web site to our visitors.

- **Information We Share**

We do not sell or otherwise disclose personal information about our members or web site visitors, except as described here. We may share information provided by our members or visitors to UPAL.com with service providers we have retained to perform services on your or our behalf. These service providers are contractually restricted from using or disclosing the information except as necessary to perform services on our behalf or to comply with legal requirements. In addition, we may disclose information about you (i) if we are required to do so by law or legal process, (ii) to law enforcement authorities or other government officials, or (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity. We reserve the right to transfer any information we have about you in the event we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use personal information you have provided through this web site or otherwise in a manner that is consistent with this Privacy Statement.

- **Information We Transfer**

We may transfer the personal information we collect on this site, but we will do so only for the purposes described above. We will protect transferred information as described here unless otherwise required by applicable laws.

- **Links to Other Sites**

We provide links to other web sites for your convenience and information. These sites may have their own privacy statements in place, which we recommend you review if you visit any linked web sites. We are not responsible for the content of linked sites or any use of the sites.

- **Children's Privacy**

This web site is not directed to children under the age of eighteen and we do not knowingly collect personal information from children under the age of eighteen on the site or otherwise. If we become aware that we have inadvertently received personal information from a visitor under the age of eighteen on the site, we will delete the information from our records. Some links on UPAL.com may take web site visitors to sites that are directed to children. These web sites have their own privacy notices that address children's privacy. We encourage you to read these privacy notices if you visit any linked sites directed to children.

- **How We Protect Personal Information**

We maintain administrative, technical and physical safeguards to protect against unauthorized disclosure, use, alteration or destruction of the personal information you provide on this web site.

- **Updates to Our Privacy Statement**

This Privacy Statement may be updated periodically and without prior notice to you to reflect changes in our online information practices. We will post a prominent notice on this web site to notify you of any significant changes to our Privacy Statement and indicate at the top of the statement when it was most recently updated.

- **How to Contact Us**

If you have any questions or comments about this Privacy Statement, or if you would like us to update information we have about you or your preferences, please contact us by:

Calling us at 918/747-5585 or writing us at: Utica Physicians' Association, Ltd.
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Tulsa, OK 74136