



NOTICE OF INSURANCE INFORMATION PRACTICES

Your Privacy is Our Concern

When you apply for any type of insurance you disclose a certain amount of information about yourself to us. Law regulates the collection, use, and disclosure of such information. In addition, The Upton Group, LLC. recognize the confidentiality expectations of our applicants and policyholders. We also expect our independent agents to follow the same policy regarding the confidentiality of your information in their business practices. Therefore, it is the policy of The Upton Group, LLC. and its independent agents to:

- Collect only information necessary or relevant to our business.
- Make a reasonable effort that information we act upon is accurate, relevant, timely and complete.
- Use only legitimate means to collect information.
- Make non-public personal financial information available externally only to respond to legitimate business needs, to regulatory or other government authorities, or as otherwise permitted by law.
- Limit employees' access to only those who have a business reason for knowing such information and are trained in the proper handling of personal information.

We are providing you with the following summary of the kinds of information that The Upton Group, LLC. or its agents may collect, what is done with information after it is collected, and how you can find out about information, if any, we have about you in our records.

What kind of information do we collect about you and from whom?

The Upton Group, LLC. gets most of our information directly from you. The application you complete, as well as any additional information you provide, generally gives us most of the information we need to know. Sometimes we may contact you by phone or mail to obtain additional information. Depending on the nature of your insurance transaction, we may need additional information about you or other individuals proposed for coverage from outside sources, such as motor vehicle records, loss information reports, credit reports, court records or other public records. For property insurance, we may send someone to inspect your property and verify information about its value and condition. A photo of any property to be insured might be taken.

We also might obtain information from third parties, such as other insurance companies or consumer reporting agencies. A consumer report from such an agency may contain information as to credit worthiness, credit standing, credit capacity, character, general reputation, hobbies, occupation, personal characteristics or mode of living. The consumer reporting agency preparing a consumer report for us may keep the information collected about you as permitted by law.

What do we do with the information collected about you?

Information that has been collected about you may be maintained in either our policy records or in your agent's files. We may review it in evaluating your request for insurance coverage and in determining your rates. We may also refer to and use information in our policy records for purposes related to issuing and servicing insurance policies and settling claims. If coverage is declined, or if the charge for coverage is increased because of information contained in a consumer report we obtained, we will tell you as required by state law and the federal Fair Credit Reporting Act. We also give you the name and address of the consumer-reporting agency making the report.

Should you cease to be one of our policyholders, or after your claim is settled, it is our policy to archive your information for a minimum period of six (6) years.

To whom do we disclose information about you?

We will not disclose information about you without your written consent unless the disclosure is necessary to conduct our business. By law, we can share information about you without prior permission under certain circumstances to certain people and organizations. For example:

- Our affiliated insurance companies.
- Your agent or broker.

- Parties that perform a business, professional or insurance function for our company, including our reinsurance companies.
- Independent claims adjuster, appraisers, investigators and attorneys in order to investigate, defend or settle a claim involving you.
- Businesses that help us with data processing or marketing.
- Businesses that conduct statistical or industry research, including actuarial or underwriting studies.
- Other insurance companies, agents or consumer reporting agencies in connection with any application, policy, or claim involving you.
- Insurance support organizations that are established to collect information for the purpose of detecting and preventing insurance crimes or fraudulent claims.
- Medical care institutions or medical professionals to verify coverage or claims -related services.
- Insurance regulatory agencies in connection with the regulation of our business.
- Law enforcement or other governmental authorities to protect our legal interest or in cases of suspected fraud or illegal activities.
- Authorized persons as ordered by a subpoena, warrant or other court order, or as required by law.
- Certificateholders or policyholders for providing information regarding the status of an insurance transaction.
- Lienholders, mortgagees, lessors or other persons shown on our records as having a legal or beneficial interest in your policy.

We do not otherwise give information about you to people or organizations that would use the information to contact you about their own products or services.

How do we protect the confidentiality of information about you?

Our company maintains security standards and procedures to prevent unauthorized access to your information. We limit employee access to personally identifiable information to those with a business reason for knowing such information. The Upton Group, LLC. also believes in educating our employees so that they will understand the importance of confidentiality of personal information, and in acting appropriately to enforce employee privacy responsibilities. Should you cease being a customer, we will continue to protect your personal information in this same manner.

How can you find out about information we have about you?

You have a right to know what kind of information we keep about you in our files, and you have a right to have reasonable access to the information. We may not be able to disclose to you certain types of information collected when evaluating claims or possible lawsuits. In addition, we will not send you any medical information we have received about you from a doctor or other health care provider. Instead, you should contact the doctor or health care provider directly to obtain the information you seek. If applicable, we will give you the name and address of any consumer reporting agency that prepared a report about you, so that you can contact them for a copy.

To submit your request for information, please send your complete name, address, and policy number (or type of insurance applied for), to:

The Upton Group, LLC.
 Privacy Inquiries
 356 Gunter Ave
 Guntersville, AL 35976

Upon receipt of your request to review your personal information, we will inform you in writing of the nature and substance of locatable and retrievable recorded personal information about you in our files. You may request a copy of this information from us for a reasonable charge to you. If you believe the personal information we have about you in our records is incomplete or inaccurate, you may request that we make any necessary corrections to the disputed personal information.

We thank you for choosing The Upton Group, LLC. for your insurance protection. We strive to preserve the confidentiality and security of your private information. Our time-honored commitment to preserving your privacy continues, as it does in our more traditional means of serving you.