



Online Privacy Practices and Privacy Notice

EFFECTIVE DATE: JANUARY 1, 2014

Online Privacy Practices

These Online Privacy Practices only relate to the information we collect online. See below for our general privacy notice applicable to consumers as required by federal law. How we handle information about you when you visit our website will depend on what you do when visiting comerica.com and other websites owned by Comerica Bank.

Customer information

SOLELY VISITING OUR WEBSITE

If you visit our website to solely read information and do not use any of our online services (offered to non-customers and/or customers), then we collect and store only the name of the domain from which you access the Internet, the date and time you access our website, Internet address of the website from which you linked directly to our website and your zip code. We may record the “IP address” assigned to you by your internet service provider as part of this process. We use the information we collect to measure the number of visitors to different sections of our site, and to help make our website more useful to visitors.

USING OUR SERVICES

We recommend that when you complete your online transactions to log off completely before visiting other sites and/or restart your personal computer. This may clear your cookies (see “Cookies” discussion below). We also recommend that you do not visit other sites during your online banking session with us.

When you visit our website and use our website to engage in account opening or electronic banking services (e.g. Comerica Web Banking®), then there may be times when you are asked to provide information about you that is personally identifiable (“Personal Information”). This may include the following:

Personal

- your first, middle and last name,
- your zip code, home or other physical address (including the street name and name of a city or town),
- your e-mail address,
- a telephone number,
- social security number,
- account number,
- date of birth,
- mother’s maiden name,
- password or any other identifier that permits physical or online contact with you, and
- geolocation.

In addition to above we may ask you to provide non-personally identifiable information; however, such information may be deemed to be sensitive or personal for identity theft and other fraud purposes. This may include the following:

Financial

- Average Account Balance,
- Household Income,
- Federal Income Tax Bracket,
- Monthly Debt,
- Monthly Rent, and
- Available Down Payment Amount.

Other

- Account Preferences,
- Needs for Savings,
- Challenge/Security Questions,
- User IDs, and
- Passwords.

Please note that user IDs, personal IDs, passwords, and PINs along with tokens or challenge/security questions would be provided by you only in connection with you opening or logging onto one or more of our services or when you set up and use an aggregation service that allows you to consolidate your financial account information from a variety of sources. Comerica Bank would never request personal information (e.g. social security number, user IDs, or passwords) via unsolicited e-mail. Be cautious when clicking on links in e-mails or responding to e-mails you have received, particularly when the message is urgent or threatening. By doing so, you may unwittingly download viruses or spyware that may cause you to be redirected to a fraudulent site, even when you type in a legitimate site address, such as comerica.com/privacy. If you are concerned that an e-mail you have received may not be from Comerica, then please send the suspicious e-mail to us at fraud@infosecalerts.com.

Personal information might be needed or requested from you for you to be able to open deposit accounts online or to register for online banking and other services, or to fill out our forms or applications for services for special promotions or contests, or to accomplish transactions you request. This may result in sharing Personal Information with third parties (such as data processors or service bureaus) as part of servicing your accounts or transactions.

Cookies, Web Beacons and Other Technologies

As mentioned above, we collect information from your online visits to our website and your use of our online banking services to help gather statistics about usage and effectiveness, personalize your experiences and tailor our interactions with you. We do so through the use of various technologies, including the use of cookies, web beacons and other use-tracking devices.

DEFINITIONS

- **Cookies.** A “cookie” is generally a small piece of data sent from a website and stored in a user’s web browser while the user is browsing the internet. A “session cookie” is a cookie that exists in temporary memory only while the user is reading and navigating a particular website. A session cookie is typically deleted when the user closes his or her browser. A “persistent cookie” is a cookie that generally outlasts the user’s current online session and may be sent back to the server every time the user visits the same website. Persistent cookies are commonly referred to as “tracking cookies” since the user’s activity on a particular website may be tracked over time.
- **Web Beacons.** A “web beacon” is an object that is embedded in a web page or e-mail and is usually invisible to the user but allows checking that a user has viewed the page or e-mail. It is basically a technique to track who is reading a web page or e-mail. A web beacons, also called “web bugs” are often invisible to the user because they may be very small (only 1-by-1 pixel) and/or are made to blend in with the background color of the webpage, document, or e-mail message. Web bugs are identified with HTML IMG tags in the webpage.

USE OF COOKIES

Cookies help websites keep track of your preferences and to recognize you as a return visitor. When you return to a website you have visited before, your browser gives the information stored in the cookie back to the website’s server. For example, in addition to other information, www.comerica.com may use a cookie to save your zip code location selection so that we can present product and service information that is available in your area. Additionally, we may use cookies to facilitate online surveys, to track how visitors use our site, or to deliver our products and services to you. We use this information to improve the content, usability and functionality of our website. Recording information in a cookie allows us to simplify and personalize your online experience, as well as delivering our products and services to you. We generally use both session and persistent cookies.

You may choose to set your browser to reject cookies. However, we do not recommend disabling cookies on our website because you may not be able to log in or use basic features on our website such as Comerica Web Banking®. For more information see the "Help" information for the browser you are using. If you do not wish to have cookies placed on your computer, you should set your internet browser to refuse cookies before accessing our site, with the understanding that certain features of the site may not function properly without the aid of cookies. If you refuse cookies, you assume all responsibility for any resulting loss of functionality. Please see the heading “Our Response to Web Browser Do Not Track and Other Similar Mechanisms” below for further information.

USE OF WEB BEACONS

With the assistance of a cookie, web bugs may collect the IP address of your computer, the URL of the page the web bugs comes from and the time it was viewed, or other personal information. For example, web bugs may add information to a personal profile of what sites a person is visiting and to determine what banner ads to display based on the profile. Another use of web bugs is to provide an independent accounting of how many people have visited a particular website and to gather statistics about web browser usage at different places on the Internet. You may use the "view profiles" of the webpage you are viewing on our website to see whether the page is using a web bug.

USE OF OTHER TECHNOLOGIES

Comerica may use other use-tracking devices, which may change from time-to-time as technology changes, to help diagnose problems and to administer our website. We also may track browser types to help us understand our visitors' needs related to our website design.

Our website may include advertisements for third parties and their products, and those third-party advertisements and websites may include a cookie, web bugs, or other device of the third party. Comerica does not have control over the cookies, web bugs, or other devices used by third parties and does not have access to whatever information they may collect.

If you visit our website or engage in any online service that we offer, then we may collect and store the categories of Personal Information. We will not share the Personal Information you provide us at our website with a third party, except as described below under the heading "Categories of Third Parties with Whom Comerica May Share Information."

OUR RESPONSE TO WEB BROWSER DO NOT TRACK AND OTHER SIMILAR MECHANISMS

You may set your web browser to disable the ability for one or more websites to track your usage. For example, as stated above under the heading "Use of Cookies," you may choose to set your browser to reject cookies. We will respect any disabled cookies as a do not track mechanism that provides you a choice regarding the collection of Personal Information when you visit or conduct online activity on our websites regardless of whether your visit or online activity is a one-off occurrence or occurs over time. However, we may not be able to respond or take any action when it comes to other "do not track" technologies due to technology and industry standards constantly evolving. Also, we are unable to respond or take any action when you access third party websites or online services. Further, please note that if you set your browser to disable cookies or other tracking mechanisms, then your experience using our online services may not be the same depending on the particular service. Specifically, functionality of a service may be limited, may not function properly, or may not work at all. These functionalities include, but are not limited to, settings as to screen size and appearance, logon verification, and pre-populated information.

OTHER PARTIES MAY COLLECT PERSONAL INFORMATION

Other parties that may collect personal information about you when you use one or more of our websites once or over time are generally limited to service providers with whom Comerica Bank may share in order to administer, process or service the product or service you are using online.

CATEGORIES OF THIRD PARTIES WITH WHOM COMERICA BANK MAY SHARE INFORMATION

Presently, Comerica Bank discloses Personal Information to third-party persons about our customers or former customers only as permitted by law in connection with the administration, processing or servicing of accounts.

We will not share your personally identifiable information with third parties and our marketing partners except as permitted by law to those third party persons or entities that perform services for us on your behalf. This may also include disclosure to protect against fraud, or as part of an audit or examination; and disclosure to protect and defend our rights and property or to act in an emergency or to protect someone's safety.

As we develop our business, we may also buy and sell assets, and your Personal Information may be one of the transferred assets. In the event that we are acquired by another company, your personal identifiable information may be part of the assets transferred to the acquiring party.

Please be aware that other services, provided by other companies via links to their website from Comerica's website, are not subject to these Online Privacy Practices. We encourage you to review third party service providers' privacy policies before sharing your Personal Information.

PROCESS TO REQUEST CHANGES TO PERSONAL INFORMATION

We wish to maintain complete and accurate information about you and your account (including information you have entered through any Comerica Bank website). We have established procedures to assist you should you ever believe that our records contain inaccurate or incomplete information about you.

Please contact us at 313.222.3425 to complete or correct your Personal Information. We will investigate your concerns and properly correct any inaccuracies.

SECURITY STANDARDS

We safeguard any information our customers share with us, according to strict standards of security and confidentiality. View detailed security information at your convenience (See Security link below).

CHILDREN'S PRIVACY ONLINE

We do not knowingly solicit, collect, or use personal information from children under 13. For information concerning the Children's Online Privacy Protection Act (COPPA), visit the Federal Trade Commission's website at www.ftc.gov.

CHANGES TO OUR ONLINE PRIVACY PRACTICES

We reserve the right to change our Online Privacy Practices. If we make updates to our Online Privacy Practices, we will update the Online Privacy Practices and revise the "Effective Date" at the top of these Online Privacy Practices. Any updates to our Online Privacy Practices become effective when we post the updates to our website. Your continued use of any portion of our website following the posting of the updated Online Privacy Practices will constitute your

acceptance of the changes.

ACCEPTANCE OF THESE ONLINE PRIVACY PRACTICES

Your use of one or more of our websites, including dispute concerning privacy, is subject to these Online Privacy Practices and the Terms and Conditions of Use (see Terms and Conditions link below). By using our website, you are accepting the practices set out in these Online Privacy Practices and our Terms and Conditions of Use.

Comerica's Privacy Notice for Individuals

FACTS	What Does Comerica Do With Your Personal Information?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> • Social Security number and employment information • Transaction or loss history and credit scores • Account balances and risk tolerance
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Comerica chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Comerica share?	Can you limit this sharing?
For our everyday business purposes- such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes- to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	Yes (excludes private label credit card companies)
For our affiliates' everyday business purposes- information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes- information about your creditworthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	No	We don't share

To limit our sharing	<ul style="list-style-type: none"> • Call toll free 866.517.1800 – our menu will prompt you through your choices or • Visit us at: http://www.comerica.com/privacyresponse <p>Please note: If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
Questions?	Call 800.266.3742

Who we are	
Who is providing this notice?	Comerica Bank, Comerica Bank & Trust, National Association, Comerica Securities, Inc., Comerica Insurance Services, Inc., Comerica Insurance Services of Texas Incorporated, Interstate Select Insurance Services, Inc., World Asset Management, Inc., and Bank of the Hills, a division of Comerica Bank.

What we do

How does Comerica protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Comerica collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • open an account or make deposits or withdrawals from your account • apply for insurance or apply for a loan • use your credit or debit card <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes-information about your creditworthiness • affiliates from using your information to market to you • sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. (See below for more on your rights under state law.)</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Comerica does not limit sharing by account but rather by individual. Therefore, your choices will apply to all of your accounts with Comerica. Any joint account holder may make their own choices, or you can select on their behalf.

Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • <i>Our affiliates include financial companies with a Comerica name and other financial companies such as World Asset Management, Inc.</i>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • <i>Comerica does not share with nonaffiliates so they can market to you.</i>
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • <i>Our joint marketing partners include merchant payment processors, credit card, insurance, stored value card and check printing companies.</i>

Other important information
<p>State law</p> <p>You may have other privacy protections under state laws; we will comply with all applicable state laws with regard to our information sharing practices.</p> <ul style="list-style-type: none"> • California residents only – California law specifies an alternative form for your privacy choices. You may either opt-out using the separate form titled “Important Privacy Choices for California Consumers” or the other options previously described in this notice. • New Mexico, North Dakota and Vermont residents only – Per state law, we have automatically opted you out of the sharing of your information.
<p>Contacting a bank regulator</p> <p>Comerica Bank is chartered under the laws of the State of Texas and by state law is subject to regulatory oversight by the Texas Department of Banking. Any consumer wishing to file a complaint against Comerica Bank should contact the Texas Department of Banking through one of the means indicated below:</p> <p>In Person or U.S. Mail: Texas Department of Banking 2601 North Lamar Boulevard Suite 300 Austin, TX 78705-4294</p> <p>Telephone Number: 877.276.5554 (toll free)</p> <p>Fax Number: 512.475.1313</p> <p>E-mail Address: consumer.complaints@dob.texas.gov</p> <p>Website Address: www.dob.texas.gov</p>

You can reach this page at: <http://www.comerica.com/help-center/pages/privacy-notice.aspx>

