

# Exhibit 170

# Help Center

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## Our Commitment to Your Security

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### Prevention Begins with You

## Our Commitment to Your Security

### Common Fraud Scams

**Effective Date: April 1, 2008**

### Privacy

New advances in security technology are happening daily, and Comerica is constantly evaluating its security architecture in an effort to provide the highest level of privacy and safety for our customers. While there are important security issues associated with electronic transactions, strict internal procedures are in place within Comerica, controlling our online services from training employees, to confirming customer transactions, to preventing service interruptions. We safeguard information according to industry security standards and procedures, and we continually assess new technology for protecting information. We go to great lengths to secure your money and personal data, using several different types of technology to help ensure the confidentiality of your transactions.

### Customer Protection FAQs

#### Encrypted Transmission

Once you begin the login process to Comerica web applications, the exchange of information over the Internet is encrypted. This means the information is scrambled in such a way that it cannot be read by anyone other than you and Comerica. This is accomplished by using the Secure Sockets Layer (SSL) protocol. **Secure Sockets Layer protects your information through a browser like Netscape Navigator® or Microsoft Internet Explorer®, that supports 128-bit encryption.** If your browser requires an update, it can be downloaded for free by visiting the Netscape or Microsoft web sites. The browser actually does all the encryption and Secure Sockets Layer works for you, behind the scenes. You know it is working when you see the key or the lock (in the locked position) appear on your browser window.

### Additional Resources

### Unlawful Internet Gambling Prohibition Notice

#### Firewalls

Comerica's computer network containing all of your account information is strictly controlled. To limit access into and out of Comerica's computer network, Comerica employs a series of firewalls—specially configured computers that sit between our internal network and the external Internet. These firewalls provide a gateway that controls access to Comerica's online services, helping to protect your information and our systems from unauthorized activity over the Internet.

#### Security Summary

We utilize advanced Internet technologies to make online banking as secure as it is convenient. These technologies are designed to protect your information throughout the entire online banking process from your computer through the bank's own systems and back. Numerous efforts have been made to secure your account information to you. Online banking uses various methods to accomplish this:

1. **User ID and Password:** Only your valid ID and password will allow you to login.
2. **Automatic Logoff:** If no action is taken for several minutes, your session will be automatically terminated and you will be logged off.
3. **Protecting Online Applications:** Comerica websites use secure forms. Other websites may not. Be sure to check the security of these websites. When you apply for online banking products and services with Comerica, you provide personal information that is necessary for us to process your application. It is sent to us in a "secure session" utilizing Secure Sockets Layer (SSL) to ensure your information remains confidential. Additional details are provided in the Encrypted Transmission section.
4. **Constant Monitoring:** We are always monitoring our systems to prevent any potential problems that could compromise security or privacy.

#### Individual Security Enhancements

Many companies, including Comerica, are taking advantage of the enormous potential offered by public networks such as the Internet by making more and more of their products and services available online. Comerica uses a variety of technologies and techniques to secure its products and services. You can also enhance security and help control risks when using your personal computer or when conducting business online. Here are some steps you can take:

- **Basic Security:** Keep your password, account numbers, Personal Identification Numbers and other account data confidential. Change your password regularly and avoid using obvious personal information. Make it a regular habit to log out of online banking when you're finished.

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Use extreme caution when opening e-mails received from unknown sources and pay special attention to any attachments.

- **PC Software:** Ensure your browser is using the highest encryption available (see Encrypted Transmission section above for details). Comerica currently requires 128-bit encryption.
- **Communicating with Others:** Use good judgement in communicating with others, especially those you do not know. Regular non-encrypted Internet e-mail is not secure. Provide only non-sensitive and non-confidential information in an e-mail request or response.
- **Account Management:** Routinely review and reconcile your account information. Contact us at 877.881.8955 immediately if you have a concern.
- **Take Advantage of the Opportunities:** The Internet is and will continue to be the source of many new opportunities. Those who get the most out of these opportunities will be those who use them wisely. Although the foregoing list of guidelines is not exhaustive, it contains some key points that will help you use the Internet in a more secure manner. Use the guidelines along with caution and good judgment.

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