



March 19, 2012

Dear Sir or Madam:

Thank you for your inquiry regarding Key's compliance with the Massachusetts Standards for the Protection of Personal Information of Residents of the Commonwealth, 210 CMR 17.00. Key has implemented a program designed to comply with applicable federal law regarding the protection and privacy of personal information. Key, as a federally regulated bank, is required by federal regulation to maintain a comprehensive information safeguarding program with administrative, technical and physical safeguards to protect the security, confidentiality and integrity of customer information.

Key has implemented and will maintain appropriate security measures to protect such information consistent with the Annotated Laws of Massachusetts, Chapter 93H, §5 and its implementing regulation, the Massachusetts Standards for the Protection of Personal Information of Residents of the Commonwealth, 201 CMR 17.00, et seq.

Sincerely:

KeyBank, N.A.  
127 Public Square  
Cleveland, OH 44114