

PRIVACY IMPACT ASSESSMENT

Tax Return Preparation Services – Doral Bank BDO Puerto Rico, PSC (BDO)

July 2016

FDIC External Services

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System Overview

The Federal Deposit Insurance Corporation (FDIC) maintains stability and public confidence in the nation's financial system by insuring deposits, examining and supervising financial institutions (FIs), and managing receiverships. The primary objective of the FDIC as receiver is maximizing the value of failing and/or failed insured depository institutions and their assets. The FDIC Division of Resolutions and Receiverships (DRR) is tasked with disposing of these assets in the most cost-effective manner possible.

In order to ensure FIs in receivership are able to meet their financial and administrative obligations to employees, vendors, and taxing authorities, the FDIC has engaged the services of BDO Puerto Rico, PSC (BDO) to provide tax return preparation and general tax/accounting/business consulting services for Doral Bank and its subsidiary entities: Doral Recovery II, LLC, Doral Mortgage, LLC, and Doral Investment International, LLC. BDO provided these services for Doral Bank and its subsidiary entities prior to Doral's failure, and has now been engaged by the FDIC to provide these services for another year after its failure. The failed FI data provided to BDO includes personally identifiable information (PII) such as failed FI employee full names, home addresses, employee identification numbers, account numbers, and Social Security numbers (SSNs). The data has been provided to BDO in order to process payroll tax returns and generate Internal Revenue Service (IRS) reporting documents such as W-2s and 1099-MISCs.

Personally Identifiable Information (PII) - BDO

BDO collects personally identifiable information (PII) that may include: full name; Social Security number (SSN); employment status, history or information; home address; and financial information.

Purpose & Use of Information - BDO

The data is utilized by BDO personnel to generate corporate tax returns, payroll tax returns, and tax reporting documents for Doral Bank and its subsidiary entities.

Sources of Information - BDO

FDIC/DRR: The FDIC transmits failed FI financial information to BDO via secure email. The financial information consists of payroll spreadsheets, balance sheets, mortgage summaries, and financial reports. These documents contain PII such as Doral Bank employee full names, home addresses, employee identification numbers, account numbers, and SSNs. The documents also contain employee financial data such as employee wage information, and tax withholdings.

Notice & Consent

Individuals do not have the opportunity to “opt out” of providing their data and/or consenting to particular uses of their information. Information is not collected directly from individuals.

Access to Data - BDO

BDO Staff, Subcontractors, and/or Systems: Authorized BDO personnel consisting of their senior management/shareholders, outsourcing manager, and outsourcing associates are responsible for reviewing the FDIC-provided failed FI financial information and generating tax returns and reporting documents on their internal network.

FDIC Personnel and/or FDIC Systems/Applications: FDIC/DRR personnel are responsible for reviewing the completed tax returns and reporting documents received from BDO via secure email.

Data Sharing

Other Systems that Share or Have Access to Data in the System:

System Name	System Description	Type of Information Processed
N/A	N/A	N/A

Data Accuracy - BDO

BDO works with FDIC to verify the integrity of the data before and after inputting it into the system or using it to support the project.

As necessary, a shareholder with the tax return preparation services team checks the data for completeness by reviewing the information, verifying whether or not certain documents or data is missing, and as feasible, updating this data when required.

Data Security – BDO

BDO has gone through the security review required by the FDIC’s Outsourced Information Service Provider Assessment Methodology to determine and verify their having appropriate physical, technical, and administration security measures to safeguard FDIC-provided PII and other sensitive data.

The FDIC conducts background investigations on key BDO personnel and other applicable personnel prior to their beginning work on the contract.

BDO is subject to periodic compliance reviews by FDIC. Per the contract, scheduled and unannounced inspections and assessments of the outsourced service providers’ facilities, personnel, hardware, software, and their security and privacy practices are

conducted by one of the following: the FDIC information technology staff, the FDIC Inspector General, or the U.S. General Accountability Office (GAO). These inspections may be conducted either by phone, electronically, or in-person, on both a pre-award basis and throughout the term of the contract or task order, to ensure and verify compliance with FDIC IT security and privacy requirements.

Within FDIC, the BDO Program Manager/Data Owner, Technical Monitors, Oversight Manager, and Information Security Manager are collectively responsible for assuring proper use of the data. In addition, it is every FDIC user's responsibility to abide by FDIC data protection rules which are outlined in the FDIC's Information Security and Privacy Awareness training course which all employees take annually and certify that they will abide by the corporation's Rules of Behavior for data protection.

Additionally, BDO is responsible for assuring proper use of the data. Policies and procedures have been established to delineate this responsibility, and BDO has designated a Vice President to have overall accountability for ensuring the proper handling of data by BDO personnel who have access to the data. All BDO personnel with access to the data are responsible for protecting privacy and abiding by the terms of their FDIC Confidentiality and Non-Disclosure Agreements, as well as BDO's corporate policies for data protection. Access to certain data may be limited, depending on the nature and type of data.

BDO must comply with the Incident Response and Incident Monitoring contractual requirement.

System of Records Notice (SORN)

BDO operates under the FDIC Privacy Act SORN 30-64-0013, *Insured Financial Institution Liquidation Records*.

Contact Us

To learn more about the FDIC's Privacy Program, please visit:
<http://www.fdic.gov/about/privacy/>.

If you have a privacy-related question or request, email Privacy@fdic.gov or one of the [FDIC Privacy Program Contacts](#). You may also mail your privacy question or request to the FDIC Privacy Program at the following address: 3501 Fairfax Drive, Arlington, VA 22226.

