

# PRIVACY IMPACT ASSESSMENT

## FDIC On-Line Store E Group

August 2016

FDIC External Services

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## System Overview

This service supports the FDIC's Rewards and Recognition (R&R) Program administered by the Division of Administration (DOA) Human Resources Branch (HRB) to provide formal recognition of employee achievements and time in service. The R&R Program guidelines are described in full within FDIC Circular 2420.1, FDIC Rewards and Recognition Program.

The contractor, E Group, provides support and assistance in the administration of the FDIC R&R Program, including the development of an on-line website for FDIC's Non-Monetary Awards Program (referred to as FDIC On-Line Store). The service provides authorized Division and Office personnel the ability to procure items on behalf of their respective Division or Office using the FDIC Procurement Card for the purpose of delivering Recognition of Service awards as well as other FDIC approved items, such as:

- Retirement medallions
- Award (plaques) and lapel pins
- Federal service anniversary mementos
- Non-monetary awards
- FDIC logo & special order items

Pre-authorized users will log into the On-Line Store from the FDIC Intranet site to access the application by use of their User ID and Password. Initially, the vendor (E Group) will generate unique passwords that will be assigned to each authorized user, which is provided in an encrypted email to the respective user. When users sign in for the first time, they will need to change their passwords to a password of their choice.

Orders are submitted from the Oversight Manager to E Group via secured email. The information for the FDIC Online store will be held on a database located at E-Group's subcontractor, CoreXpand. Orders and order information for the awards program will be securely stored within the vendor's encrypted electronic job jacket.

Orders may include former employees or retirees. In these instances, the vendor sends the retirement medallion and the service anniversary items to the home address (provided through secure email). If the award recipient does not attend the ceremony or pick up their award plaque or board resolution after the ceremony, the plaque is either sent to their office or home mailing address.

## Personally Identifiable Information (PII) – E Group

E Group collects personally identifiable information (PII) that may include: full name and home address.

## Purpose & Use of Information – E Group

The data described above is necessary for the contractor, E Group, to ensure the timely processing, tracking, and fulfillment of orders procured by FDIC employees.

## Sources of Information – E GROUP

**FDIC On-Line Store:** Order date, dollars spent, product name, quantity, price, employee name, business email, ship to address (business), phone, FDIC procurement credit card number (only last 4 of credit card number are stored)

**Email to Vendor (Call Order):** Recipient name, home address, email address, years of service, employment status, and type of award

## Notice & Consent

Individuals do not have the opportunity to “opt out” of providing their data and/or consenting to particular uses of their information. This information will be needed to place and order from the FDIC Online store. Information is obtained from FDIC sources. Individuals are not provided the opportunity to “opt out.”

## Access to Data – E Group

**E Group Staff, Subcontractors, and/or Systems:** A limited number of authorized individuals at E Group will have access to names of employees, years of service, and home addresses in order to provide them with service awards. This information will be provided to E Group from the Oversight Manager via secured email that will be protected by the E Group via an encrypted electronic jacket.

**FDIC Personnel and/or FDIC Systems/Applications:** Names, item(s) ordered, and shipping address can be provided to Online Store OM for tracking purposes only. The information will be provided via a secure email.

A limited number of DOA HR staff have access to data in order to track orders, manage fulfillment, and manage inventories.

## 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 – E Group

Data is collected directly from FDIC employees. As such, the FDIC and its vendors rely on the individuals who are placing the orders to provide accurate data.

## Data Security – E Group

E Group and subcontractor CoreXpand have 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 E Group personnel and other applicable personnel prior to their beginning work on the contract.

Within FDIC, the On-Line Store 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, E Group is responsible for assuring proper use of the data. Policies and procedures have been established to delineate this responsibility, and E Group has designated a POC to have overall accountability for ensuring the proper handling of data by E Group personnel who have access to the data. All E Group 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 E Group's corporate policies for data protection. Access to certain data may be limited, depending on the nature and type of data.

E Group must comply with the Incident Response and Incident Monitoring contractual requirement.

## System of Records Notice (SORN)

E GROUP operates under the FDIC Privacy Act SORN 30-64-0031, *Online Ordering Request 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](mailto: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.

