

PRIVACY IMPACT ASSESSMENT

Allegiance Software, Inc. Engage 7 (ENGAGE)

June 2013

FDIC External System

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System Overview

The Allegiance Engage 7 (“Engage”) is the standard survey builder software used by the FDIC. The Engage software is owned and externally hosted by Allegiance Software, Inc. Engage provides FDIC with the ability to generate and manage web-based surveys. It also offers a variety of reporting and analytics tools that allow authorized FDIC users to track survey results and create reports to meet survey requirements.

Surveys are administered on an external server and sent to survey participants via hyperlink; this may be done via email or by posting the link online to FDICnet or FDIC.gov. Engage surveys are typically used by FDIC to collect data from survey respondents, which may include a limited amount of sensitive Personally Identifiable Information¹ (PII) (i.e., their names and personal contact information), non-sensitive business information, and work-related contact information (i.e., work email address, work telephone number, etc.). For example, FDIC has used Engage surveys to collect information from individuals interested in registering for FDIC events, which included their names, personal email addresses, personal telephone numbers, and their home mailing addresses. In instances where large FDIC-insured financial institutions have failed, the FDIC has used Engage surveys to notify customers/borrowers about the failure to collect the names, email addresses, and telephone numbers of customers/borrowers who had questions pertaining to the bank failure. The email addresses and telephone numbers collected from customers may be personal or work-related, depending on what the customers choose to provide.

Prior to designing and implementing an Engage Survey where PII may be involved, individuals are required to consult with the FDIC Privacy Program and/or Legal Privacy Act Clearance Officer to determine if the survey requires a Privacy Act Statement or other type of privacy notice.

Once a survey has been approved for deployment, the authorized FDIC Division/Office Internet Coordinator builds or uploads an invitation list in Engage. The invitation list may contain PII, including the names and email addresses of the survey recipients. The email addresses are generally work-related, but may be personal, in instances where the Engage surveys are distributed to members of the public (e.g., borrowers/customers of failed financial institutions or individuals interested in registering to attend an FDIC event). After deploying a survey, the Office/Division Internet Coordinator may then access survey data on the externally hosted server with the option to download a local copy of the data for use to conduct further analysis and reporting.

Personally Identifiable Information (PII) in Engage

Personally Identifiable Information (PII) in Engage is collected directly from individuals. Types of PII collected may include: full name, home address, and phone numbers (work phone and/or personal).

¹ Sensitive PII, as defined by the FDIC, may consist of a single item of personal information (e.g. Social Security Number) or be comprised of a combination of two or more items of personal information (e.g., full name along with financial, medical, criminal, or employment information).

Purpose & Use of Information in Engage

The PII collected by Engage is used by authorized FDIC Division/Office Internet Coordinators as a means to contact survey respondents, and may also be used to track, manage, and report on survey results. In accordance with FDIC policies, all PII collected through the Engage survey software must be relevant and necessary to accomplish an authorized FDIC business need. In those instances where a business need has been identified, the collection and maintenance of PII must be minimized as much as possible.

Sources of Information in Engage

Information in Engage is typically obtained directly from the individual. For surveys that are distributed via email or require authentication, the authorized FDIC Division/Office Internet Coordinator uploads or builds an invitation list in the Engage survey software. The invitation list may contain PII, including the names and email addresses of the survey recipients.

Links to surveys can be published to both FDICnet and FDIC.gov, and may also be distributed via email to survey recipients. The links provide access to web-based survey forms that are used to collect data directly from survey respondents.

Limited PII may also be collected from FDIC systems and applications in order to build invitation lists for Engage surveys. For example, FDIC Internet Coordinators have the option to import survey recipient names and work-related email addresses from Microsoft Outlook's Active Directory/Global Address List (GAL) in order to generate Engage invitation lists.

Limited PII about members of the public may be collected from non-FDIC systems and applications in order to build survey invitation lists. For example, when the FDIC Division of Resolutions and Receiverships (DRR) uses Engage surveys to notify borrowers/customers about the failure of FDIC-insured financial institutions, the borrower/customer names and personal email addresses may be obtained from the failed institution's (or its Servicer's) systems/records. In turn, authorized FDIC Division/Office Internet Coordinators import/upload the invitation list to Engage.

Notice & Consent

Individuals participating in FDIC surveys may choose to remain anonymous by opting out of providing personal information. In instances where collection of personal data is necessary to accomplish a business purpose, a Privacy Act Statement or privacy notice is furnished to survey participants, instructing them about the intended purpose and use of the PII data and whether/how they may opt out of providing personal data.

Access to Data in Engage

Authorized FDIC Division and Office Internet Coordinators have access to the Engage software in order to generate and implement surveys for their respective Divisions/Offices. After deploying a survey, the Office/Division Internet Coordinators then have access to the survey data on the externally hosted server with the option to download a local copy of the data for use with Microsoft Excel, Word, and/or PowerPoint to conduct further analysis and reporting. Exported data and survey results are provided to authorized FDIC employees and managers (i.e., survey customers/requestors) in the Internet Coordinator's Program Office of Division on a "need to know" basis in support of authorized business needs.

FDIC contractors supporting FDIC Division/Office employees may also be provided with access to survey data and reports as necessary to complete their official business duties.

Authorized Allegiance staff have access to all data residing on their external servers for administration and technical purposes. The survey data, which may include PII, is maintained on the Engage platform which is externally hosted and owned by Allegiance.

Data Sharing

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

No other system currently shares or has access to the data within Engage.

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

Data Accuracy in Engage

Data is collected directly from individuals. As such, the FDIC and Engage rely on the individuals to provide accurate data.

Data Security for Engage

Allegiance has gone through a security review and has been approved by FDIC to collect and maintain the data within Engage. Within FDIC, the Division of Information Technology (DIT) Information Security Manager (ISM), DIT Project Manager, and Division/Office Internet Coordinators are collectively responsible for assuring proper use of the data. Additionally, it is every FDIC user's responsibility to abide by FDIC data protection rules.

System of Records Notice (SORN)

The Engage survey application does not require a SORN as it does not independently operate as a Privacy Act System of Records. In appropriate circumstances, Engage may be employed to collect Privacy Act records that will be maintained and used in accordance with an established FDIC Privacy Act System of Records, and such use requires prior consultation with the FDIC Privacy Program Office to ensure Privacy Act compliance.

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.

