

# PRIVACY IMPACT ASSESSMENT

## Check Printing and Distribution Fiserv Federal Systems, Inc. (Fiserv)

March 2016

FDIC External Services

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## System Overview

Fiserv Federal Systems, Inc. (Fiserv) has been contracted to produce a large number of deposit claims checks and depositor information letters in a limited timeframe in the event the Federal Deposit Insurance Corporation (FDIC) executes a Payout Transaction when closing a failed financial institution (FI).

The FDIC Division of Resolutions and Receiverships (DRR) has established a Receivership Basic Ordering Agreement (RBOA) for a number of vendors that are able to receive a file containing data necessary to produce and print checks, insert them into envelopes, and deliver the checks to the United States Postal Service (USPS) within limited time frames. This RBOA will be used in the event that the FDIC needs to produce a large number of payments via check within a short time frame. The vendors will also use the FDIC data file to create letters to be mailed separately to the recipients of the checks. The vendor will be required to conduct periodic tests of their ability to produce checks and prepare them for mailing. Actual Check Printing/Distribution services required for a specific receivership will be authorized at a task order level via a Check Printing/Distribution Statement of Work (SOW) Addendum that describes the specific requirement for that particular task order/receivership.

The FDIC's requirements for Fiserv document/ output production include: simplex print apron style letter with perforated checks (the check will be at the bottom of the page); positive pay image; PDFs of output to CD/DVD and shipped to FDIC or delivered to the secured site; and inclusion of the graphical/logo provided by the FDIC.

Fiserv must allow FDIC employees to observe the entire process. The risk-level designation for this contract is "High." Given this designation, all Fiserv personnel working on the contract must be United States citizens.

## Personally Identifiable Information (PII) - Fiserv

Fiserv collects personally identifiable information (PII) that may include: depositor full name; depositor home address; and depositor financial information.

## Purpose & Use of Information - Fiserv

Fiserv uses the data file to print checks, check stubs, and depositor insurance letters (from a template provided by FDIC/DRR), places them in envelopes, and delivers them to a USPS facility to be delivered to insured depositors as claims payments and notifications.

## Sources of Information - Fiserv

**Failed FIs:** Fiserv receives all data from a failed FI through the FDIC in the form of a data file. The data file received by Fiserv includes depositor name, depositor address, depositor claim number, depositor account type, depositor account number, check number, check date, check amount, and FDIC call center telephone number.

## Notice & Consent

Individuals do not have the opportunity to “opt out” of providing their data and/or consenting to particular uses of their information. The sensitive PII is not obtained directly from borrowers/customers of failed FIs, but rather is derived from failed FI records in FDIC receivership. This information is required to determine the depositors’ claims payments and notifications in FDIC receivership. Therefore, individuals do not have an opportunity to opt out or provide consent for the use of the data for these purposes.

## Access to Data - Fiserv

**Fiserv Staff, Subcontractors, and/or Systems:** Fiserv personnel and systems require access to the FDIC data file in order to process and print checks. Fiserv receives and coordinates the data file from the FDIC through a file transfer server, and then, transfers the data file to another file transfer server. Once the file has been tested and validated for accuracy and integrity by the Fiserv project manager, production begins and Fiserv delivers all enveloped checks to a USPS facility to be sent to depositors.

**FDIC Personnel and/or FDIC Systems/Applications:** Fiserv allows access to the FDIC Oversight Manager (OM) and Technical Monitor (TM) to observe and periodically test the entire process. Only certain FDIC/DRR employees have access to data in FDIC systems. The data file from the failed FI is uploaded into the Claims Administration System (CAS) and processed by FDIC’s Deposit Insurance Claims agents and Claims Department personnel assigned to particular bank closings. Once all the data is processed and insurance determinations are completed, a new CAS data file is uploaded to the Divident Payment System (DPS). FDIC personnel with processing permissions approve payments, and generate data files which are uploaded to Fiserv’s file transfer server. A digital copy of the printed checks are exported onto an encrypted CD/DVD and sent back to the FDIC DRR Technical Monitor of the contract via secure courier.

**Individual Members of the Public:** Once check production is done, Fiserv places the checks in envelopes and delivers them to a USPS facility to be delivered to insured depositors as claims payments and notifications. The checks, along with the letter of depositors which is printed from the FDIC-provided template, are placed in the envelopes. The printed checks contain the depositor’s name, depositor’s claim number, depositor’s account number, check number, check date, check amount, and the FDIC call center telephone number.

## Data Sharing

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

System Name	System Description	Type of Information Processed
<b>FDIC Claims Administration System (CAS)</b>	CAS enhances FDIC's ability to process claims in a timely manner. It is used to support the downloading of datasets containing depositor information from both large and small financial institutions and decrease the amount of manual work done primarily by FDIC Staff.	Data from failed FI needed to process claims checks includes depositor full name, depositor address and financial information.

## Data Accuracy – Fiserv

Data is collected directly from the failed FIs. As such, the FDIC and Fiserv rely on the FIs to provide accurate data.

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

## Data Security - Fiserv

Fiserv has gone through the security review required by the FDIC to determine and/or verify their having appropriate physical, technical and administrative security measures to safeguard FDIC-provided PII and other sensitive data.

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

Fiserv is subject to periodic compliance reviews by FDIC. Per the contract, scheduled and unannounced inspections and assessments of Fiserv's 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 Fiserv Program Manager/Data Owner, Technical Monitors, Oversight Manager, and Information Security Manager (ISM) 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, Fiserv is responsible for assuring proper use of the data. Policies and procedures have been established to delineate this responsibility, and the vendor has designated a compliance and security specialist to have overall accountability for ensuring the proper handling of data by vendor personnel who have access to the

data. All Fiserv 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 Fiserv's corporate policies for data protection. Access to certain data may be limited, depending on the nature and type of data.

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

## System of Records Notice (SORN)

Fiserv 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](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.

