

PRIVACY IMPACT ASSESSMENT

Legal Data Warehouse (LDW)

November 2006

FDIC Internal System

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System Overview

The FDIC utilizes the Legal Data Warehouse (LDW), an electronic data storage facility that provides the Corporation's Legal Division with access to data from multiple other legal systems used by the FDIC. LDW stores case matter information from other legacy FDIC Legal Division systems, such as: the Legal Integrated Management System (LIMS), Legal Payment System (LPS), Case Management System (CMS), RTC Legal Information System (RLIS), Legal Services Invoice (LSI) System, and Outside Counsel Information System. LDW contains personally identifiable information categorized as employee disciplinary data. Data within the system is static (it is not modified or refreshed) and is also used for reporting purposes. Reports can be produced according to individual employee names as well as names of people associated with employee disciplinary matters.

Personally Identifiable Information (PII) in LDW

LDW stores the names of FDIC employees, contractors, and other individuals, business tax ID numbers, and Corporate disciplinary data related to official matters.

Purpose & Use of Information in LDW

LDW does not collect or store PII. All system data is designed to manage Legal Division matters and is used only for reporting purposes. Data can be retrieved through reports using any number of criteria, including case number, case name, name of financial institution, dates, and name of the case oversight attorney. No PII is produced. No social security numbers are stored. The purpose of LDW is to provide a management tool for Legal Division matters as well as a reporting mechanism for Legal Division data.

Sources of Information in LDW

The LDW is a storehouse for case matter information from legacy Legal Division systems including the Legal Integrated Management System (LIMS), the Legal Integrated Management System (LIMS), Legal Payment System (LPS), Case Management System (CMS), RTC Legal Information System (RLIS), Legal Services Invoice (LSI) System, and Outside Counsel Information System. Tables are also imported from personnel systems.

Notice & Consent

Data is acquired directly from legacy FDIC Legal Division systems; data is not collected from the individual. As such, individuals do not have the right to decline to provide their personal information for use in LDW. Data includes in-house and outside counsel case management information and employee disciplinary data. The data is stored to provide ad hoc reporting capability for management use only. Reports produced from the data in LDW are disseminated only to the appropriate management personnel and are not publicly available.

Access to Data in LDW

A small group of Legal Division personnel have access to prescribed views of data in the system. These users can develop queries to extract specific data to fulfill authorized reporting requirements. Users cannot add, modify or delete any data. Developers, contractors and administrators may have access to development and quality assurance environments, as needed.

Data is accessed by technicians trained to develop search queries to extract specific data for reporting purposes. They do not have access to the actual data tables, but see data through 'views' built for this purpose. The reports built from this data are disseminated only to appropriate management personnel, and are not publicly available.

User browsing is restricted according to defined rules, Users can not add, modify or delete data. Users do not have access to the actual tables, but only set views of the tables.

All individuals that have access to LDW must complete a Contractor Confidentiality Agreement and Non-Disclosure Agreement on an annual basis.

The criterion, procedures, controls and responsibilities regarding access to LDW complies with the Corporation's Access Control Policies and Procedures.

Data Sharing

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

No other systems share or have access to data within the LDW system.

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

Data Accuracy in LDW

Data contained in LDW is collected from other legacy Legal Division systems. As such, it is up to the owners of these other systems to ensure that the information maintained in them is accurate and up to date. Data can be retrieved, however, through reports using any number of criteria; this includes the case number, case name, bank information, dates, and names of attorneys.

Data Security for LDW

Data access is restricted through roles and privileges. Only one individual has administrator privileges. All other users have only the ability to read the data and build and execute queries. Access to LDW is determined on a "need to know basis", and is limited to authorized personnel whose official duties require such access.

The LDW Program Manager/Data Owner is responsible for the management and decision authority over a specific area of corporate data. The LDW Program Manager/Data Owner serves as the source of information for data definition and data protection requirements, and is responsible for supporting a corporate-wide view of data sharing.

In accordance with OMB Circulars A-123 and A-130, LDW has controls in place to prevent the misuse of the data by having access to the data. Such security measures and controls consist of passwords, user identification, user profiles and software controls. All users, including contractors, must meet the requirements for securing Privacy Act protected information. Users that are approved for access to LDW are deemed to have the authorization to access and review any data maintained. The controls are applied during the process of approving a user for access. In addition, if an authorized user does not utilize their access on a regular basis, the login is inactivated and access is not permitted. Users who are inactivated must reapply for access

System of Records Notice (SORN)

Currently, LDW does not operate as a Privacy Act system of record.

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.

