

PRIVACY IMPACT ASSESSMENT

Online Ordering System (OOS)

September 2015

FDIC External Services

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System Overview

The Federal Deposit Insurance Corporation (FDIC) offers free publications and products to the general public and banking industry through the Online Ordering System (OOS), a web-based solution built and maintained by Smartronix on behalf of the Department of Treasury. The OOS website enables bankers, the public, internal FDIC stakeholders, and other online visitors to browse, download, or order a range of free FDIC publications, products and materials in a variety of formats, including hardcopy (print) materials, DVDs, and electronic file downloads. There are approximately 300 products currently offered through OOS, including but not limited to FDIC Law, Regulations, Related Acts; a variety of deposit insurance publications and teller signs; consumer financial literacy publications such as Consumer News and Money Smart products; and specialized stationery products for internal FDIC use. To place an order, visitors enter their personal or business-related contact information (full name, email address, shipping address, and telephone number) in an online order form on the website. Credit/debit card information is not collected.

The administrative module of the OOS software allows authorized internal FDIC users to: manage orders; create, suspend or delete new products; retain customer names and mailing addresses; create mailing lists for new issuances; establish and maintain inventory control; and run standard and customized reports to measure productivity and program effectiveness.

The OOS solution is hosted through Amazon Web Service (AWS) East/West Cloud. The cloud based online ordering system software is Drupal Commerce. It supports the core business capabilities to include product ordering (shopping cart), inventory management, and subscription management. These modules are accessed and managed by multiple FDIC divisions and offices, specifically the Division of Administration (DOA), Division of Depositor and Consumer Protection (DCP), and any other division that needs to make various types of documents and media available to the public. This solution will fulfill business, technical, and regulatory compliance needs while increasing measurable business process efficiencies and ensuring secure, high availability to FDIC users. The system will contain only non-sensitive personal and business contact information.

Personally Identifiable Information (PII) - OOS

OOS collects personally identifiable information (PII) that may include: full name; home address; phone number (non-work); and email address (non-work).

Purpose & Use of Information - OOS

The personal or business contact information is necessary to ensure the timely processing, tracking and fulfillment of orders by authorized FDIC employees and contractors. The information also is critical to ensuring that product inventories are maintained to meet demand, particularly at a time of increased bank closings, and that required management reports for products, such as Money Smart, can be produced in a timely manner.

Sources of Information - OOS

Web Site Visitors/User Entry: Members of the public, FDIC employees or representatives from banks, businesses and community organizations visiting the site and wanting to place an order will directly input their own personal or business contact information into OOS. After browsing and adding items to the shopping cart, the visitor will be required to either register with the system by setting up an account profile and providing the required information, or authenticate to the system using the user name and password previously provided to them when they set up their account profile.

Organizations ordering *Money Smart* materials also will be required to provide additional information about how the materials will be used (e.g., financial education training). The system will collect non-sensitive PII.

FDIC Systems Users: If a customer is unable to access a computer, they can call or email an authorized representative from the FDIC Public Information Center (PIC) and have their data entered into the system on their behalf, resulting in the creation of an account profile. This data includes the non-sensitive personal or business contact information specified above.

Using the separate administrative site, FDIC system users also will upload product offering information to OOS, currently found on FDIC.gov. OOS consolidates these offerings into one application for improved customer service and order processing. The product information uploaded by FDIC users into the system does not contain PII.

Former OOS: Product information and subscription data was imported into OOS 2.0 from the previous system. The subscription data consists of an existing list of subscribers and mailing address information (for both individuals and organizations) to various FDIC publications and newsletters. The data was imported to the new OOS to ensure continuity of service.

Notice & Consent

Individuals have the opportunity to decline to provide their personal data or to consent to particular uses of their information. The general public and users can browse the catalog anonymously. However, after browsing and adding items to the shopping cart, the visitor will be required to either register with the system by setting up an account profile and providing the required information, or authenticate to the system using the user name and password previously provided to them when they set up their account profile. The information is required by FDIC to process transactions, fulfill orders, manage customer relationships to better serve the customer.

Individuals unable to access a computer may call or email an authorized representative from the FDIC Public Information Center (PIC) and have their data entered into the system on their behalf, resulting in the creation of an account profile.

Access to Data - OOS

OOS Staff, Subcontractors, and/or Systems: A limited number of authorized individuals at Smartronix will have access to non-sensitive PII data within OOS, in order to provide system management, database management, and technical support.

FDIC Personnel and/or FDIC Systems/Applications: In order to manage day-to-day order tracking, order fulfillment and reporting, a limited number of FDIC users will have access to the account profile data in the system via the OOS administrative site. FDIC system users will be authorized to see only certain account data based on their roles and need-to-know. FDIC system users are as follows:

- **FDIC Administrators:** Administrators from DOA and DCP serve as OOS system managers with full access and administrative rights to ensure continuity of service and manage user access and advanced catalog management functions.
- **FDIC DCP Staff:** DCP publishes *Money Smart* and non-*Money Smart* brochures and related deposit insurance and consumer protection resources. Orders typically taken online on FDIC.gov, or collected from individuals at outreach events, will now be taken by OOS. A limited number of DCP staff will have access only to OOS data related to these orders and will use the data to manage their catalogue of products and respond to customer inquiries. DCP staff also are required to prepare aggregate data reports for management on the number of *Money Smart* items ordered by the public (e.g., per region or by organization). The DOA PIC is responsible for fulfilling all DCP product orders.
- **FDIC DOA PIC Staff:** DOA PIC staff is responsible for processing product orders, as well as orders coming directly through their web site, particularly for hardcopy publications. Orders typically taken online on FDIC.gov or by telephone, fax or email will now come through OOS. Any orders to be placed by phone or fax will be entered by DOA PIC staff. As such, a limited number of DOA PIC staff will have access to applicable OOS data in order to track orders, manage fulfillment, respond to customer inquiries and manage inventories. DOA provides mailing labels to an internal FDIC warehouse or third-party contractor to assist with the fulfillment process.

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 - OOS

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

As necessary, an administrator of the OOS 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 - OOS

Treasury (Smartronix) 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.

Treasury (Smartronix) 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 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, Smartronix is responsible for assuring proper use of the data. Policies and procedures have been established to delineate this responsibility, and Smartronix has designated a program manager to have overall accountability for ensuring the proper handling of data by vendor personnel who have access to the data. All Smartronix 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 Smartronix's policies for data protection. Access to certain data may be limited, depending on the nature and type of data.

The Outsourced Provider must comply with the Incident Response and Incident Monitoring as defined in the Inter-Agency Agreement with Treasury.

System of Records Notice (SORN)

OOS 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 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.

