

PRIVACY IMPACT ASSESSMENT

Online Ordering Solution (OOS)

November 2009

FDIC Internal System

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System Overview

The Federal Deposit Insurance Corporation (FDIC), through several of its Divisions, provides a number of products, publications and materials, deposit insurance publications and videos, updates for *FDIC Laws, Regulations and Related Acts*, and subscriptions to newsletters to the public, businesses, community organizations and other federal agencies. In addition, FDIC provides manuals to staff (e.g., bank examiners) and products to FDIC insured banks, such as FDIC logos and teller signs. Many of these items may be downloaded from FDIC's public-facing web site (www.fdic.gov); others must be obtained through one of several different online ordering processes.

In order to improve customer service and streamline FDIC's order and fulfillment processes, the FDIC Office of Communications has implemented a new centralized, web-based system, called the Online Ordering Solution (OOS). FDIC employees administer the system with support from the FDIC contractor, Govolution. OOS enables visitors to browse and order a range of FDIC publications, products and materials in one location, using one ordering form. To place an order, visitors must enter information into an online form that populates the Govolution electronic information system on the Govolution web site. The site is linked from the relevant FDIC.gov web page (e.g., *Money Smart*) or can be accessed directly at <https://vcart.velocitypayment.com/fdic/index.php>. For certain transactions, OOS also facilitates the secure transfer and processing of debit/credit card payments.

Individuals that call, mail, or make requests by other means are guided to the web site to complete the online order form or allow FDIC staff to enter the information they provide. Once collected, the information is maintained on the contractor's electronic system in a secured environment.

The FDIC contractor, Govolution, provides a separate and secure administrative site on OOS, so that authorized FDIC employees can track and process orders, as well as, easily administer their products on the site (e.g., add, remove or change) and overall product inventories.

Personally Identifiable Information (PII) in OOS

OOS users typically consist of banks, businesses and community organizations. OOS contains personal and non-personal information on some members of the public, such as:

- **Registration/Account Profile Information:** An individual's full name, personal e-mail address, home billing/shipping address, and personal telephone number are collected when he/she registers for an account in OOS. OOS also contains business contact information for individuals representing banks, businesses or organizations, as well as FDIC employees, using the site. Banks requesting FDIC signs and logos are also required to provide a certification number.
- **Optional Information:** Users have the option of adding their organization name and fax number.
- **Order History:** The account profile contains an individual's order history, order identification number, and subscription information. OOS also contains

- a product notification list for those opting into receiving updates about purchased products.
- **Log-on Credentials:** OOS assigns each individual with unique logon credentials that are also stored in the account profile.
 - **Payment Information:** For certain transactions, debit/credit card information are required. The data is maintained in a separate and secure database managed by the contractor and not in the individual's account profile. As such, the individual will be required to re-submit this data for every new purchase. All debit/credit card data is redacted and encrypted within the contractor's payment transaction platform.

Purpose & Use of Information in OOS

Personal or business contact information contained in OOS is necessary to ensure the timely processing, tracking and fulfillment of orders by authorized FDIC employees and contractors. The information is also 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 in OOS

Web Site Visitors: Members of the public, FDIC employees or representatives from banks, businesses and community organizations visiting the site and wanting to place an order directly input their own personal or business contact information into OOS. After browsing and adding items to the shopping cart, the visitor is 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 username and password previously provided to them when they set up their account profile.

For applicable orders, visitors also enter their own debit/credit card payment via a secure payment form. Upon successful processing by, OOS presents the user with an order number and an email receipt. As previously noted, debit/credit card information is not stored in the account profile, so visitors must re-enter the information each time they make a new purchase.

Organizations ordering *Money Smart* materials are also required to provide additional information about how the materials will be used (e.g., financial education training).

FDIC System 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.

Using the separate administrative site, FDIC system users also upload product offering information to OOS, currently found on FDIC.gov. The OOS consolidates these offerings into one application for improved customer service and order processing.

FDIC Specialized Tracking and Reporting (STAR) System: The FDIC Public Information Center maintains an existing list of subscribers (both individuals and organizations) to various FDIC publications and newsletters. The data consists of mailing address information that is uploaded to OOS to ensure continuity of service.

Notice & Consent

Individuals do not have the opportunity to opt-out of providing the required contact information when ordering, purchasing or subscribing to publications through the OOS shopping cart site. The information is required by FDIC to process transactions and fulfill orders.

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 in OOS

The following groups have access to OOS:

- **Web Site Visitors:** Visitors to the OOS web site, who have created a customer account, have access to their own account profile and order or subscription history information.
- **Contractor Personnel:** A limited number of authorized individuals at Govolution have access to the OOS data, in order to provide system management and technical support. However, they do not have access to the full debit/credit card information that is stored in a separate, encrypted database.
- **FDIC System Users:** In order to manage day-to-day order tracking, order fulfillment and reporting, a limited number of FDIC users have access to the account profile data in the system via the OOS administrative site. FDIC system users are only authorized to see certain account data based on their roles and need-to-know. FDIC system users do not have access to any debit/credit card information.

FDIC system users from various Divisions/Offices access OOS in the performance of their daily job duties, including the Office of Communications (OCOM), Division of Administration (DOA), Legal Division, Division of Depositor and Consumer Protection (DCP), and the Division of Insurance and Research (DIR). The primary purpose for access is to track orders, manage fulfillment, respond to customer inquiries, 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
U.S. Department of Treasury's Pay.gov	Pay.gov can be used to make secure electronic payments to Federal Government Agencies. Payments can be made directly from your bank account or by credit/debit card. Pay.gov provides OOS with transactional data regarding the success of the transaction, is stored within the OOS administrative suit for reporting/fulfillment purposes.	Debit/Credit card transaction data
FDIC Specialized Tracking and Reporting System (STARS)	The Specialized Tracking and Reporting System (STARS) is a customized tracking and workflow system designed for use by the Division of Supervision and Consumer Protection (DSC) regional offices and headquarters to track incoming correspondence and telephone calls from consumers and bankers that are not examination related. Data from STARS is uploaded to OOS.	Name, address, email address, title, organization, and telephone number

Data Accuracy in OOS

When entering information in order to register their account on the OOS website, individual customers are responsible for ensuring the accuracy and completeness of their profile and debit/credit card information. Additionally, FDIC system users entering information on behalf of the customer are responsible for ensuring the data is complete and accurate. Data entered into the public facing web site of the OOS system is validated for acceptable input and protected against embedded commands. No other data is permitted into the system that is not FDIC-owned.

Data Security for OOS

Data maintained in OOS is stored at a secure site and on secure servers maintained by the contractor at only one location. Access is granted only to those authorized employees or contractors with a "need to know" the data in the performance of their daily duties, which includes tracking orders, managing fulfillment, responding to customer inquiries, and managing inventories.

Access to the data within the FDIC OOS is restricted to those FDIC employees currently involved in managing publication and product orders. Access will be role-based and on a need to know basis. If an FDIC user within a Division does not belong to a role that has been defined as having access to a particular set of data, that user will not be able to access that particular information.

FDIC users will be required to follow Corporate and Division policies concerning the appropriate handling and protection of sensitive information. FDIC users also are reminded of their responsibilities during annual privacy and security awareness training.

System of Records Notice (SORN)

OOS operates under the following 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.

