

PRIVACY IMPACT ASSESSMENT

Qualtrics Research Suite (Qualtrics)

July 2014

FDIC External Service

Table of Contents

[System Overview](#)

[Personally Identifiable Information \(PII\) in QUALTRICS](#)

[Purpose & Use of Information in QUALTRICS](#)

[Sources of Information in QUALTRICS](#)

[Notice & Consent](#)

[Access to Data in QUALTRICS](#)

[Data Sharing](#)

[Data Accuracy in QUALTRICS](#)

[Data Security for QUALTRICS](#)

[System of Records Notice \(SORN\)](#)

[Contact Us](#)

System Overview

The FDIC uses the Qualtrics Research Suite as its standard survey builder software. The software is owned and externally hosted by Qualtrics and 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 easily configure custom reports to meet survey requirements.

Surveys are administered on an external server and sent to survey participants via hyperlink, either by email or by posting the link online to FDICnet or FDIC.gov. All requests to administer surveys must be approved by the appropriate FDIC Division or Office Internet Coordinator, and align with FDIC's internal policy for collecting and protecting sensitive information and Personally Identifiable Information (PII). Surveys are typically used by FDIC to collect data from survey respondents, which may include a limited amount of sensitive 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 may use surveys to collect information from individuals interested in registering for FDIC events, which include 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 may use Qualtrics surveys to notify customers/borrowers about the failure and to collect the names, email addresses, and telephone numbers of customers/borrowers who have 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 a survey where PII may be involved, individuals are required to consult with the FDIC Privacy Program and/or the 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, and is to be distributed via email or if authentication is required for the survey, the authorized FDIC Division/Office Internet Coordinator builds or uploads an invitation list in Qualtrics. 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 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 with Microsoft Excel, Word, or PowerPoint, to conduct further analysis and reporting.

Personally Identifiable Information (PII) in QUALTRICS

Qualtrics may collect personally identifiable information (PII) relevant to FDIC employees, FDIC contractors, borrowers/customers of failed financial institution, FDIC visitors, and members of the public (as applicable and necessary). This information may include: full name, home address, email address and phone number (may be work or personal).

Purpose & Use of Information in QUALTRICS

The PII collected by Qualtrics 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 accord with FDIC policy, all PII collected through surveys 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 QUALTRICS

Information in Qualtrics may be entered manually by authorized users. 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 survey software, which may contain PII (e.g. names and email addresses of survey recipients).

Information may also be directly collected from individuals participating in the survey. Links to surveys can be published to both FDICnet and FDIC.gov, and may also be distributed by email to survey respondents. Limited PII may be collected (such as names) as well as non-sensitive data and work-related contact information (e.g., work email address, work telephone number).

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

Limited PII about members of the public may also be collected from non-FDIC systems and applications in order to build survey invitation lists. For example, when FDIC DRR uses surveys to notify borrowers/customers, or 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 Qualtrics.

Notice & Consent

Individuals have the opportunity to decline to provide their personal data or to consent to particular uses of their information. 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 or how they may opt out of providing personal data.

Access to Data in QUALTRICS

Authorized FDIC Division and Office Internet Coordinators have access to the Qualtrics website to develop and implement surveys for their respective Divisions/Offices. After deploying a survey, the Office/Division Internet Coordinators then have access to the survey data and download a local copy of the data for use with Microsoft Excel, Word, or PowerPoint to conduct further analysis and reporting. Authorized FDIC Internet Coordinators may export survey data to Microsoft Excel, Word, or PowerPoint for results tabulation and reporting purposes. 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 or Division on a "need-to-know" basis in support of authorized business needs. On a "need-to-know" basis, contractors supporting FDIC Division/Office employees (i.e., survey customers/requestors) may be provided access to survey data and reports as necessary and relevant to their official business duties.

Survey data, which may include the PII specified above, is maintained at Qualtrics. In this capacity, authorized Qualtrics staff members have access to all data residing on their servers for administration and operations maintenance purposes.

Data Sharing

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

No other systems currently have access or share data with QUALTRICS.

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

Data Accuracy in QUALTRICS

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

Data Security for QUALTRICS

Within FDIC, the individual survey 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.

System of Records Notice (SORN)

QUALTRICS does not currently operate under a FDIC Privacy Act SORN.

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.

