

# PRIVACY IMPACT ASSESSMENT

## Regional Automated Document Distribution and Imaging (RADD)

November 2010

FDIC Internal System

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## System Overview

The Federal Deposit Insurance Corporation (FDIC) is an independent agency created by the Congress to maintain stability and public confidence in the nation's financial system by insuring deposits, examining and supervising financial institutions for safety and soundness and consumer protection, and managing receiverships.

The FDIC Division of Risk Management Supervision (RMS) utilizes the Regional Automated Document Distribution and Imaging (RADD) system to support the examination and supervision mission. RADD is a document imaging, routing, and storage system for financial institution correspondence and final examinations documents. Hardcopy documents are stored in secure file rooms in regional offices. With the RADD system, each hardcopy document is converted to a PDF that is stored electronically.

## Personally Identifiable Information (PII) in RADD

RADD is a document imaging, routing and storage system for financial institution correspondence and final examination documents. The information in RADD varies in nature and may relate to any type of bank examinations reports, loan records, applicant backgrounds, bank enforcement actions, and correspondence with bank officials or consumers.

As a result, the reports, records, and other sources related to bank examinations and correspondence maintained in RADD may contain personally identifiable information (PII) and non-PII of bank officers, employees, and customers such as: name, date of birth, Social Security Number (SSN), photographic identifiers, driver's license/state identification number, biometric identifiers, employee identification number, vehicle identifiers, home address, non-work telephone numbers, non-work email address, financial records or numbers, certificates of birth, death, marriage, naturalization or marriage, legal documents, criminal records, investigation reports, education records, military records, employment records, or foreign activity or interest reports.

## Purpose & Use of Information in RADD

The data maintained in RADD is both relevant and necessary for the purpose for which the system was designed, namely to convert bank examination documents in an electronic format, route and store the data within the system. The data within the system is necessary to support the examination and supervision mission of the FDIC.

## Sources of Information in RADD

The information in RADD is derived from financial institutions in support of the examination and supervision process. Financial institutions may submit information in various formats to FDIC and may include examination reports, letters and other

correspondence from and to financial institutions. The RADD system provides the conversion of the hardcopy documents and electronic storage of the PDFs.

## Notice & Consent

Individuals do not have the opportunity to “opt out” of providing their information for inclusion in RADD. Data is collected from FDIC insured banks and not directly from individuals. This data is gathered as part of the examination and supervision activities of the FDIC and other bank regulators.

## Access to Data in RADD

Authorized Division of Risk Management Supervision (RMS) examination and supervisory personnel with a “need to know” are granted access to the RADD system for the purpose of carrying out their official FDIC duties. System administrators are provided with access to RADD databases for updates and maintenance. This includes contractors as well, who support the network resource and SQL servers for maintenance purposes.

## Data Sharing

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

System Name	System Description	Type of Information Processed
<b>Virtual Supervisory Information on the Net (VISION)</b>	VISION is a web-based system designed to track and document insured depository institutions enforcement actions. VISION provides RADD non-sensitive bank structure data.	Non-sensitive bank structure data

## Data Accuracy in RADD

Data in the system is collected directly from the financial institutions. Therefore, it is the responsibility of the financial institution to ensure that data provided to the FDIC is accurate and up to date. The system is operated in several regional sites, and the PDF files are stored on each region resource server. These documents are “read only” and do not allow for data manipulation. The system metadata is stored in a single SQL database that is only accessible by an administrator.

## Data Security for RADD

FDIC has controls in place, such as role based access controls, firewalls, and intrusion-detection system (IDS) to prevent unauthorized monitoring.

All authorized FDIC users and contractors must take the mandatory annual FDIC Information Security and Privacy Awareness Training, which includes specific policies

and procedures for responsibility and accountability of information regarding compromise and the prevention of misuse of data. All users are responsible for protecting personal information covered by the Privacy Act and must certify that they agree to abide by the system's Rules of Behavior to retain access to the system. Contractors must sign an annual Contractor Confidentiality Agreement to be granted access for the purpose of maintenance of the RADD system.

## System of Records Notice (SORN)

The RADD system operates under the following Privacy Act SORNs:

- FDIC 30-64-0002, *Financial Institution Investigative and Enforcement Records*
- FDIC 30-64-0004, *Changes in Financial Institution Control Ownership Records*
- FDIC 30-64-0005, *Consumer Complaint and Inquiry Records*
- FDIC 30-64-0008, *Chain Banking Organizations Identification Records*
- FDIC 30-64-0016, *Professional Qualification Records for Municipal Securities Dealers, Securities Representatives, and U.S. Government Securities Brokers/Dealers*
- FDIC 30-64-0025, *Beneficial Ownership Filings (Securities Exchange Act)*

## 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.

