

PRIVACY IMPACT ASSESSMENT

Selene Finance, LP
(Selene)

May 2015

FDIC External Services

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System Overview

When a financial institution fails, and the Federal Deposit Insurance Corporation (FDIC) is appointed as receiver, one of the FDIC's primary tasks is to dispose of the failed bank's loans or assets in a manner that maximizes their value. To accomplish this, the FDIC employs several strategies, one of which involves selling some or all of the failing bank's assets to healthy financial institutions. Any loans not sold in the initial sale are packaged and offered for sale to the broader financial market. Until the FDIC sells the failed bank's loans or assets, it undertakes the associated loan-servicing responsibilities of collecting and crediting borrower payments and managing escrow accounts.

Loans and the rights to service loans are routinely bought and sold. The failure of the financial institution does not change the borrower's obligation to pay the loan. A borrower will continue to make payments under the original terms of the loan. The only change to the borrower is the ownership of the loan transferred to the FDIC with the failure of the financial institution, as if the loan and the right to service it had been sold to the FDIC.

Within FDIC, the Division of Resolutions and Receiverships (DRR)¹ is responsible for the operation, management, and loan servicing of the retained loans from failed financial institutions. To assist with its servicing responsibilities, the FDIC contracts with third-party loan servicing companies (Servicers). Servicers are charged with safeguarding assets while providing loan services, such as general loan administration, debt restructuring, and collection services appropriate to the type of loan being serviced.

To this end, FDIC has retained Selene Finance, LP (Selene) to assist with general loan administration and collection services for residential mortgage loans and consumer loans, collateralized and classified as real estate and non-real estate. From time to time, the FDIC may also transfer judgments, deficiencies, and chargebacks (JDCs) to be serviced under this agreement.

The primary services to be provided by Selene include but are not limited to:

- Automatically converting (i.e., transferring) loans from the failed financial institution or the previous loan servicer's system according to standards set forth in the contract with the FDIC;
- Collecting, processing, and recording borrower loan payments in accordance with the loan documents;
- Converting/transferring, from the previous servicer's system, the year-to-date interest paid by the borrower to enable Selene to produce IRS 1098/1099 statements and any other required IRS reports for the entire calendar year;
- Ensuring that real estate tax payments are made in a timely manner;
- Making payments of all loan fees, costs, and advances related to and incurred in connection with servicing loans received from the FDIC;
- Working with borrowers to modify, restructure, or settle loans when borrowers are having difficulty making payments or are unable to repay the loan;
- Assisting the FDIC in the sale of loans (this function is on an as-needed basis and is not a primary role of the contractor); and

¹ Within DRR, Accounting, Asset Management, Asset Marketing, Business Information Services, and Post-Closing Asset Management staff each play a role in this process.

- Managing the foreclosure or default on a loan, including repossession of collateral.

As part of the above services, Selene and its authorized subcontractors perform several activities which may involve the collection, use, and/or maintenance of sensitive personally identifiable information (PII) about borrowers. Records containing PII described in this privacy impact assessment (PIA) are primarily maintained in Selene's secure loan servicing system and owned real estate system.

Personally Identifiable Information (PII) - SELENE

Selene collects PII that may include: full name; date of birth; place of birth; Social Security number (SSN); employment status, history, or information; mother's maiden name; certificates (birth, death and/or marriage); medical information; home address; phone number (non-work); email address (non-work); financial information; driver's license or state identification number; vehicle identifiers; legal documents, records or notes; education records; military status and/or records; and photographic identifiers.

Purpose & Use of Information – SELENE

Selene will use the information to perform general loan servicing and collection activities in accordance with its contractual agreement with the FDIC. These activities include, but are not limited to the following:

General Loan Administration

- Conversion and delivery of loans, monitoring loan file content, and assisting the FDIC with the repurchase of loans;
- Administration of loans including collecting and recording payments, payoff processing, and release of liens;
- Providing the DRR Oversight Manager (OM) with the necessary information and documentation to allow an appropriate response by the FDIC to Congressional or public inquiries [e.g., Freedom of Information Act (FOIA) requests];
- Escrow administration and protection of collateral;
- Maintenance of insurance in accordance with the terms of the loan documents;
- Generate IRS 1098 and 1099 statements;
- Payment of real estate taxes in accordance with the terms of the loan documents; and
- Participation and investor loan servicing.

Default Management

- Monitor defaults and as appropriate collect past due loans;
- Restructure or modify the loan;
- Pursue short sales or compromises; and
- Foreclose or repossess collateral, as a last resort.
- Owned Real Estate (ORE)
- Perform property inspections and maintenance;

- Make property repairs;
- Manage utility, tax or creditor payments; or
- Transfer to an FDIC ORE Management Contractor.

Loan Sales Support and Reporting Requirements

- Maintain marketing pool codes on the loan assets;
- Perform or assist with the performance of due diligence;
- Provide loan status updates through specialized reports including Report of Assets in Litigation;
- Perform settlement services; and
- Prepare assignments of sold loans and transferring loans to the new servicer of the winning bidder.

Sources of Information - SELENE

Entered manually by authorized users: As part of servicing and managing loans on behalf of FDIC/Receiver, authorized Selene staff may manually enter some or all of the PII identified above about borrowers into its secure loan servicing system. If a borrower is unable to make payments or defaults on a loan, it may result in a foreclosure or repossession of collateral.

System-generated: The Selene loan servicing system will generate updated loan financial information such as principal and interest related to the borrower's loan from payments.

Note: The Selene owned real estate system is used to track and manage the sale of foreclosed properties or repossessed loan collateral. No PII is system-generated, but the system does contain PII that has been uploaded by authorized Selene staff to the respective loan file once the data is received from various sources listed below in this section.

Collected directly from individuals through a form or other mechanism: As part of their servicing activities, authorized Selene staff collect loan payments, financial documents (e.g., financial statements, income tax returns, etc.), and other loan-related information (e.g., insurance notices, tax bills, etc.). The information is obtained from different correspondence (e.g., email, fax, hardcopy forms, telephone conversations, secure website, etc.) with borrowers. The information is uploaded by Selene staff into their secure loan servicing system.

In limited instances, Selene staff may receive a complaint from a borrower about the handling of a loan. The complaint contains the borrower's name and details about their complaint, and is received via phone, fax, mail or email. When this occurs, Selene notifies FDIC/DRR staff of the complaint, and will work with FDIC/DRR staff to appropriately handle and respond to such complaints. The response and specific details are uploaded to Selene's secure loan servicing system.

Borrowers may be contacted in-person by Selene or their subcontractors for several reasons. For example, in-person outreach can occur as part of loan loss mitigation efforts or as part of property inspections or maintenance activities. PII collected as part of a property inspection or maintenance is generally limited to name and address. PII collected as part of a loss mitigation effort typically includes name,

contact information (address, phone number, and email address), and employment and financial information if related to a loan loss mitigation. Additional PII, such as military status or medical information, may be collected if provided by the borrower. PII is maintained in Selene's secure loan servicing system and owned real estate systems, as applicable.

Collected from non-FDIC entities, system(s), or application(s): As part of the services provided under its contract with FDIC, Selene and its authorized subcontractors may obtain PII from third-party entities/sources. Selene uses this information to fulfill its general loan servicing and collection responsibilities. Common examples of loan servicing responsibilities include maintaining borrower contract information and verifying the payment of property taxes and insurance. Selene staff uploads the resulting information into the borrower's file within their secure loan servicing system. Third-party entities/ sources of PII include:

- **Failed Financial Institutions/Prior Servicers:** After the failure of the financial institution, any loans retained by the FDIC are converted/transferred to Selene. During the initial loan conversion/transfer process, FDIC staff securely provides all pertinent failed bank asset/loan data, which includes the sensitive PII about borrowers, to Selene. Selene staff uploads the data to their secure loan servicing system and reviews the data to ensure successful completion of the conversion/transfer process. In addition, FDIC/DRR staff securely ships the hardcopy loan files, including copies of the collateral files and any additional documents received after the initial conversion/transfer, to Selene. Selene staff scans/images and uploads the files to its secure loan servicing system.
- **Address/Identity Verification & Financial-Related Search Services:** As part of its general loan servicing and collection responsibilities, Selene may need to verify borrower contact information, as well as conduct financial-related searches on borrowers or mortgagors. This information may be manually entered or securely transferred electronically into the borrower's file in the Selene loan servicing system. Common reports include credit reports and borrower contract information. Selene uses the following third-party firms/services to support these activities:
 - **CBC Innovis:** CBC Innovis is a reseller of credit information provided by the three nationwide credit agencies — TransUnion, Experian, and Equifax. Clients of CBC Innovis are primarily banks, mortgage companies and other institutions that have permissible purpose under the Fair Credit Reporting Act (FCRA) to obtain credit information for lending purposes. Selene uses CBC Innovis to obtain borrower credit reports and borrower contact information. Selene will request this information using PII elements of full name or SSN. Reports received back from CBC Innovis will contain PII elements of name, address, SSN, employment information, and financial information.
 - **LexisNexis®:** LexisNexis is a leading global provider of content-enabled workflow solutions. As part of its loan servicing and collection activities, Selene may need to obtain current contact information for a borrower if it is unavailable. Selene uses a secure service provided by LexisNexis to obtain current contact information for borrowers. The data received from LexisNexis includes sensitive PII, such as borrower name, date and place of birth, SSN, employment information, mother's

maiden name, contact information (address, phone number, and email address), financial information, legal information, and military status.

- **Borrower Outreach/Loss Mitigation Services (Deval, LLC):** Selene uses Deval for borrower outreach for loss mitigation purposes if they are unable to establish contact with the borrower via Deval's Call Center Operations. Deval securely provides Selene with the borrower's name, address, employment status, and financial information from the direct contact to assist with loss mitigation activities.
- **Insurance Providers (MGIC, Radian, United Guaranty, PMI, Genworth, or borrower's insurer):** Selene is required to ensure that collateral securing loans has adequate insurance coverage. Selene will receive PII from the insurance provider including name, address, phone number, insurance agency name, insurance policy number, insurance coverage amount, insurance premium, collateral value, and current principal. For mortgage insurance claims, additional PII elements received may include SSN, employment, and financial information.
- **Property Management & Tax/Insurance Payment Services:** Selene subcontracts property management activities, including occupancy inspections, property appraisal, and marketing ORE properties, to third-party firms. Selene also utilizes third-party firms and services for property ownership, valuations, and tax management, as well as to perform escrow management for the payment of property taxes and insurance payments. Specifically, the following third-party firms support these functions:
 - **ServiceLink, Residential Real Estate Review and Meridian Appraisal Group:** Selene uses ServiceLink, Residential Real Estate Review, and Meridian Appraisal Group to perform property appraisals and valuations as part of its property management responsibilities. Selene provides these companies with borrower/customer PII, including name and contact information (e.g., address and phone number), so that these firms can perform appraisals and valuations.
 - **Safeguard Properties and M&M Mortgage Services:** Selene uses Safeguard Properties and M&M Mortgage Services to perform property inspection and maintenance reports. The reports generated by these firms may contain borrower/customer PII, including name and contact information (address, phone number, and email address).
 - **CoreLogic:** As part of its loan servicing, Selene must ensure that all real estate tax payments are made. Selene uses a secure service provided by CoreLogic for property ownership, property valuations, and tax management. PII received as a result of searches may include name, SSN, contact information (address, phone number, and email address), financial information, military status, parcel number and current and delinquent tax information. It may also include a Tax Identification number.
 - **Assurant, Inc.:** As part of its loan servicing activities Selene uses Assurant to perform escrow management for insurance payments. PII received may include name, SSN, contact information (address, phone number, and email address), financial information, military status, and legal information related to the property.

Collected from federal, state, or local government agencies: Selene may collect PII from federal, state, or local government agencies, including taxing authorities and bankruptcy courts, as part of its responsibilities in loan administration, default management, or owned real estate. Specifically:

- **Federal Housing Administration (FHA):** Selene is responsible for administering and maintaining FHA mortgage guaranty insurance including making premium payments as required. This may require confirming the borrower name, property address, FHA case number, and financial information including mortgage insurance payments, and principal and interest rate on the loan.
- **State or Local Government Taxing Authorities:** Selene is responsible for verifying payment of real estate taxes and in some cases paying property taxes on behalf of the borrower. Selene or its authorized subcontractors will check with state or local government taxing authorities to request tax bills or verify tax payments. Verification may require the use of PII like borrower name, address or parcel number, SSN, and tax amount.
- **Courts:** Selene may need to collect financial information, such as bankruptcy information, about borrowers from the court system as part of default management activities. In order to obtain this information from the courts, Selene may need to provide the borrower's name, address, or SSN to the courts.

Notice & Consent

Individuals may not opt out of providing data, as the FDIC, acting in its Receivership capacity, is required to convert, service, and sell or otherwise liquidate all assets acquired from failed financial institutions, as soon as possible after the closing of the institution. To achieve this goal, the FDIC has contracted with third-party firms, such as Selene, to help service loans and other assets acquired from failed institutions. These firms require access to all personal information on each asset, in order to appropriately service, modify, or as a last resort, foreclose on a loan, or assist with selling the assets/loans.

Access to Data - SELENE

FDIC Personnel: After the loans/assets from the failed institution are converted (i.e., transferred) securely to Selene's loan servicing system, FDIC/DRR staff receives a copy of the final conversion file from Selene (via secure email or other secure means) for purposes of reconciliation (i.e., to ensure that all the files were received by Selene). This file may include PII, such as borrower name, address, account number, and SSN.

Authorized FDIC employees also receive access to Selene's secure loan servicing and ORE systems in order to view loan information from the failed bank(s) for the purposes described below:

- DRR Asset Management staff for purposes of managing and overseeing Selene's loan administration activities.

- DRR Asset Marketing staff for purposes of reviewing loan information to determine what type of sales process² is most suitable for the assets/loans.
- DRR Accounting staff for purposes of conducting financial research and reconciliation.
- DRR Investigations staff for purposes of reviewing asset/loan information pertinent to professional liability claims.
- Legal Division staff in order to research/review loan information for litigation purposes related to professional liability claims or other legal matters related to the Receivership.

Selene staff also provides monthly remittance reports and month-end reporting packages via a secure file transfer to DRR. The monthly reports and supporting documentation generally contain summary-level information about assets and do not typically contain PII. In certain instances, the remittance package may contain a notation with minimal PII (e.g., borrower name, loan number, or account balance), if there is an issue with an asset or a non-monetary adjustment.

In support of FDIC's efforts to sell loans and/or servicing rights, and upon request, Selene may also securely provide a data tape, which could potentially contain any of the PII specified above, to FDIC or its designee.

Authorized FDIC/DRR contractors who support FDIC employees in managing the loans for failed banks may also receive loan information on an "as-needed" basis for the purposes specified above. However, DRR contractors are not provided with direct access to Selene. Rather, authorized DRR employees access and retrieve loan information from the Selene loan servicing system for the contractors.

Winning Bidders/Purchasers: When assets are sold to an outside investor/bidder, Selene personnel securely de-convert (transfer) the sold assets/loan information from the Selene loan servicing system to the winning bidder's/purchaser typically by a secure file transfer. Selene personnel also inventory and securely ship the hardcopy loan files to the purchaser or another location designated by FDIC, in accord with FDIC policies governing the protection of PII. In addition, Selene staff forwards to the purchaser any checks, funds, or other documents (e.g., borrower correspondence, insurance notices, tax bills, or any other correspondence or documentation related to the loans) that are received after the de-conversion date. PII typically includes borrower name, SSN, date and place of birth, contact information (address, phone number, and email address), employment information, financial information (principal, interest rate, or credit reports), military status, legal information, and driver's license number and photograph if included in the loan documents.

Other Non-FDIC Entities/Parties and/or Non-FDIC Systems/Applications

- **Outside Counsel:** Selene, acting on FDIC's behalf, may provide copies of certain requested documents to FDIC outside legal counsel for litigation and discovery purposes. Documents are provided via secure electronic or hardcopy means, in accord with contractual requirements. PII typically includes borrower name, SSN, date and place of birth, contact information (address, phone number, and email address), employment information, financial information (principal, interest rate, or credit reports), military

² At closing, DRR Asset Marketing identifies assets for liquidation sales purposes. DRR Asset Marketing will pool like products and market the portfolio to the public. The marketed sales contain loans that have similar characteristics. The loans are grouped into pools according to specific criteria.

- status, legal information, and driver's license number and photograph if included in the loan documents.
- **Loan Sale Advisors/Financial Advisors:** Upon FDIC request and direction, Selene securely provides loan files and other related data to FDIC-approved Loan Sale Advisors/Financial Advisors via secure electronic means. These third-party entities require the data to perform asset valuation, marketing, and sales activities on behalf of the Receiver. These third-party entities are required to protect the confidentiality, security, and integrity of the data in accordance with their contracts with FDIC. PII shared relates to loan files and typically includes borrower name, contact information (address), financial information (principal, interest rate, or credit reports), military status, legal information, and driver's license number and photograph if included in the loan documents.
 - **Due Diligence Firms:** Selene is also expected to make available to FDIC-approved due diligence contractors loan files, payments histories, and any other relevant information that will aid in the successful consummation of a loan sale. This information is provided via secure electronic or hardcopy means, in accord with contractual requirements and FDIC specifications. PII shared relates to loan files and typically includes borrower name, contact information (address), financial information (principal, interest rate, or credit reports), military status, legal information, and driver's license number and photograph if included in the loan documents.
 - **FDIC Judgments/Deficiencies/Charge-offs (JDC) Partners³:** As applicable, and upon notification from FDIC, Selene securely transfers assets identified by DRR Asset Management to the appropriate JDC partner. PII shared relates to loan debts and typically includes borrower name, contact information (address), financial information (defaulted principal balance, interest rate, or credit reports), military status, legal information, and driver's license number and photograph if included in the loan documents.
 - **FDIC Owned Real Estate (ORE) Servicers⁴:** As applicable, and upon notification from FDIC, Selene securely transfers ORE assets identified by the FDIC to the FDIC's ORE servicer. Information transferred pertains to the property and will include information like property address, property tax information, and property condition.
 - **CoreLogic:** As part of its loan servicing, Selene must ensure that all real estate tax payments are made. Selene uses a secure service provided by CoreLogic for property ownership, property valuations, and tax management. PII entered by Selene to initiate a search via CoreLogic includes full name, SSN, address, and phone number. PII received as a result of searches may include name, SSN, contact information (address, phone number, and email address), financial information, military status, parcel number and current and delinquent tax information. It may also include a Tax Identification number.
 - **LexisNexis:** As part of its loan servicing and collection activities, Selene uses a secure service provided by LexisNexis to obtain current contact information for borrowers when it is unavailable. To request a verification check/search using the LexisNexis service, Selene enters or provides LexisNexis with

³ The FDIC sells assets to JDC partners in order to recover as much as possible from assets which otherwise have been charged-off. Through JDC sales, the FDIC is able to recover some funds for assets with limited to no current market value.

⁴ The FDIC contracts with firms to manage, maintain, and sell owned real estate and other property as a result of repossession.

- borrower PII, such as full name date of birth, SSN, address, and a previous known address or phone number. The data received from Lexis-Nexis includes sensitive PII, such as borrower name, date and place of birth, SSN, employment information, mother's maiden name, contact information (address, phone number, and email address), financial information, legal information, and military status.
- **CBC Innovis:** Selene uses CBC Innovis to obtain borrower credit reports and borrower contact information. Selene will request this information using PII elements of full name or SSN. Reports received back from CBC Innovis will contain PII elements of name, address SSN, employment information, and financial information.
 - **Insurance Providers:** Selene is required to ensure that collateral securing loans has adequate insurance coverage. Selene, if making insurance payments on behalf of a borrower as part of servicing the loan, will need to provide borrower PII to the borrower's insurance provider. If the collateral is not insured or insufficient coverage is not obtained by the borrower, Selene will arrange insurance through MGIC, Radian, United Guaranty, PMI, or Genworth. PII elements that Selene may need to share with insurance companies includes, name, contact information (address, phone number, email address), SSN, employment information, and financial information like a policy number. For mortgage insurance claims, additional PII elements related to a borrower's employment and financial information will be provided.

Federal, State, and/or Local Agencies

- **Federal Housing Administration (FHA):** Selene is responsible for administering and maintaining mortgage guaranty insurance including making premium payments as required. This may require sharing the borrower name, SSN, property address, FHA case number, financial information including mortgage insurance payment and payments made on behalf of the borrower or termination of insurance because of payment in full or other maturity events.
- **Internal Revenue Service (IRS):** Selene files with the IRS 1098s/1099s and other required tax reporting documents that contain PII. For example, the 1098 includes borrower's name, SSN, and mortgage interest information.
- **State or Local Taxing Authorities:** Selene, if responsible for paying property taxes on behalf of the borrower, will provide personally identifiable information to state and local governments, as necessary for making the payment. This typically may include full name, SSN, and address.
- **Courts:** Selene will file a proof of claim in the event of a borrower's bankruptcy or in the case of foreclosure. Personally identifiable information provided to the courts typically may include full name, SSN, address, and financial information. Selene will also provide PII to the courts if it receives a court order.

Data Sharing

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

System Name	System Description	Type of Information Processed
FDIC Controls Total Module (CTM) ⁵	CTM is the primary financial accounting, management, and control system for the assets of the failed financial institution. Each month, Selene wires the monthly remittance funds to FDIC and reports all financial activity in a CTM transaction file.	The CTM files provided by Selene primarily contain financial data, not PII, and are used to update asset balances and create journal entries in CTM. In certain instances, a file could potentially contain limited PII, such as borrower name in the "Asset Name" field. The remittance of the funds and reports are sent in a secure file transfer.
FDIC Communication, Capability, Challenge, and Control (4C) ⁶	4C manages the assets from the failed financial institution. On a periodic basis, Selene securely submits to FDIC in a secure file transfer an electronic "4C transaction file" which is used to update asset management and demographic information in 4C about the loans.	The 4C file may contain limited PII, such as borrower name in the "Asset Name" field, along with information about the loan/asset, such as the loan amount, amount paid, interest rate, and the property address of any associated collateral.

⁵ CTM is the primary financial accounting, management and control system for the assets of receiverships and their subsidiaries. To learn more, see the CTM PIA at www.fdic.gov.

⁶ 4C houses all asset data for failed institutions beginning with pre-close activities, through asset disposition or ongoing management. It manages data flow and updates from banks, application service providers (ASPs), as well as internal and external servicers. To learn more, see the 4C PIA at www.fdic.gov.

System Name	System Description	Type of Information Processed
FDIC Automated Corporate Tracking System (FACTS) ⁷	FACTS is a tracking tool to manage the review and approval of business decisions like a loan modification or foreclosure. Authorized Selene personnel have limited access to FACTS in order to write business cases (also referred to as "credit cases") to seek approval from authorized FDIC/DRR staff to take certain actions with respect to a failed bank asset/loan. On occasion, Selene staff may submit a case (or a draft of the case) to DRR Asset Management via secure email.	A case may include PII, such as the borrower's name, historical bank number, and contextually sensitive information about the borrower (e.g., collection efforts completed by the Servicer, challenges of working with a particular borrower, any possible bankruptcy proceedings, and legal advice and opinions for how best to proceed). Exhibits containing PII, which may be attached to credit cases in FACTS, may include, for example: financial statements for a borrower or a FICO score. Credit reports typically are not attached to credit cases.

Data Accuracy - SELENE

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

Selene works with FDIC to verify the integrity of the data in conjunction with inputting it into the system or using it to support the project.

As necessary, an authorized user of Selene's system 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 - SELENE

Selene has gone through the security review required by the FDIC's Outsourced Information Service Provider Assessment Methodology to determine and/or verify their having appropriate physical, technical and administrative security measures to safeguard FDIC-provided PII and other sensitive data.

⁷ FACTS is a web-based tracking tool used by multiple FDIC Divisions and Offices to log and route inquiries, requests for information and services, etc. To learn more, see the FACTS PIA at www.fdic.gov.

The FDIC conducts background investigations on Selene personnel and other applicable subcontractor personnel prior to their beginning work on the contract.

Selene is subject to periodic compliance reviews by FDIC. Per the contract, scheduled and unannounced inspections and assessments of Selene's facilities, personnel, hardware, software and its security and privacy practices by either 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 Selene Finance, LP Program Manager/Data Owner, Technical Monitors, Oversight Manager, and Information Security Manager 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, Selene is responsible for assuring proper use of the data. Policies and procedures have been established to delineate this responsibility, and Selene has designated an Information Security Officer to have overall accountability for ensuring the proper handling of data by Selene personnel who have access to the data. All Selene 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 Selene's corporate policies for data protection. Access to certain data may be limited, depending on the nature and type of data.

Selene must comply with the Incident Response and Incident Monitoring contractual requirement.

System of Records Notice (SORN)

SELENE operates under the FDIC Privacy Act SORN 30-64-0013, *Insured Financial Institution Liquidation 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.

