

Privacy Threshold Analysis (PTA)
and/or Privacy Impact Assessment (PIA)

for

Appraisal Management Services

Allstate Appraisal LP

(RECVR-11-G-0034)



Date Approved by Chief Privacy Officer (CPO)/Designee: 11/04/2016

SECTION I – OUTSOURCED INFORMATION SERVICE DESCRIPTION

1. Describe the outsourced service and its purpose.

The Federal Deposit Insurance Corporation (FDIC), acting in its capacity as Receiver for failed financial institutions (FIs), acquires assets throughout the continental United States, Alaska, Hawaii, Puerto Rico, Guam, and the American Virgin Islands. The FDIC's Division of Resolution and Receiverships (DRR) relies on appraisals as a significant factor in the marketing and selling of assets, and assisting in the decision-making process regarding the liquidation of an asset. Appraisals that are not reflective of current market trends and conditions adversely affect the disposition of the asset, and create potential losses to DRR. Once an asset is acquired by DRR, the appraisal is used as the basis of disposing or entering assets into transactions such as settlements, restructures, or foreclosure actions. It is the goal of DRR to dispose of an asset in the most orderly and timely manner which achieves the highest value.

To assist DRR in performing its mandate of disposing of the assets of failed FIs, DRR has contracted the services of Allstate Appraisal LP (Allstate) to provide Appraisal Management Services (AMS) on a national basis. These appraisal services are provided for assets in categories such as: 1) Single Family Residential (SFR 1 to 4); 2) SFR complex 1-4; 3) Non-Single Family Residential (non-SFR); 4) Furniture, Fixtures & Equipment (FF&E); and 5) special items.¹

Allstate engages the services of appraisers, documents all bids for appraisal services, and provides statistical data via reports. Allstate then delivers all appraisal documents, final valuation reviews, related correspondence, revised appraisals, and other documentation to DRR via ExactBid and Global Data Management Systems (DMS). ExactBid and Global DMS are secure web-based appraisal systems that provide controlled access for specifically designated authorized DRR personnel and loan servicers that may need access to completed appraisal reports.

SECTION II – DATA TYPE, SOURCES, AND USE

2. Describe all information/data that will be collected, used, maintained or generated by the Outsourced Provider (Vendor) as part of the services provided under the contract. If no information/data is involved, select Not Applicable.

Appraisal Orders from the FDIC

Appraisal-related data pertaining to failed FIs is sent to Allstate by the FDIC via the FDIC Secure Email Service in the form of appraisal orders, or by uploading additional appraisal data to ExactBid and Global DMS. ExactBid is utilized for commercial property appraisals and Global DMS is utilized for residential properties. Property appraisal order requests may include the Communication, Capability, Challenge and Control System (4C)² Asset ID Number and property address.

¹ "SFR 1 to 4" refers to property containing fewer than five individual housing units. 2) "SFR Complex 1-4" refers to family residential properties that include assets with issues such as unique market conditions, projects under construction and/or lack of comparable data for analysis. 3) "Non-SFR" refers to all real estate that is not SFR including but not limited to, retail, office, industrial, multi-family, hotel/motel, undeveloped and developed land. 4) "FF&E" refers to personal property which includes movable items of property (i.e., furniture, refrigerator, freestanding shelves, etc.). 5) "Special items" refer to owned assets or collateral such as airplanes, boats, vessels, oil rigs, art, jewelry, gold and silver bullion collections, antiques, automobiles, guns, and any other items which have a more substantial value than regular FF&E.

² The 4C system provides the FDIC with an integrated, end-to-end web-based application that supports key FDIC/DRR Franchise Marketing, Asset Marketing, and Asset Management activities. For additional information about 4C, please see the 4C Privacy Impact Assessment at <https://fdicnet.fdic.gov/content/dam/dit/itgovernance/itsecprivacy/privacyimpactanalysis/documents/4C-PIA.pdf>

Appraisal Reports from Third-Party Appraiser

Allstate engages the services of outside state-licensed and certified third-party appraisers for commercial property appraisals by soliciting bids and choosing from prospective bidders based on the appraisal criteria required by Allstate (i.e. sample appraisals by the third-party appraiser, credentials, price, turnover time, and location of property). Once the third-party appraiser has completed the appraisals, the appraisal reports are uploaded to ExactBid for Allstate’s review. Allstate’s personnel pull the completed third-party appraisals from ExactBid, review the appraisal reports for completeness and accuracy, and provide the reports to FDIC/DRR by uploading the reports back to ExactBid. The property address is included in the commercial appraisal reports received by Allstate from third-party appraisers. For residential appraisals, Allstate utilizes the automated Global DMS application. Allstate’s personnel pull the completed residential appraisals from Global DMS, review the appraisal reports for completeness and accuracy, and provide the reports to FDIC/DRR by uploading the reports back to Global DMS. The property address is included in the residential appraisal reports received by Allstate from Global DMS.

Data Received from Loan Servicers

Specific loan servicers manage residual loans from failed FIs on behalf of FDIC/DRR. The managed loans are the result of receiverships which were either not sold to acquiring institutions (AIs), or not auctioned. The loan servicers prepare order requests on Excel spreadsheets and securely email these requests to Allstate. Data elements that may be provided by the loan servicer include the PII elements from the acquired loan file already with the loan servicer: borrower, property owner, or property tenant full name, property address, contact information to gain access to the property (phone number and/or email address) and the loan servicer’s account number.

3. Describe the intended purpose and use of the above information/data. If no information/data is involved, select Not Applicable.

Appraisals are used as the basis for negotiations with AIs when DRR markets assets from failed FIs. They are also used to manage properties and loans, as well as to assist the FDIC with the disposition of failed FI assets to obtain the highest value for the FDIC in the most orderly and timely manner. The appraisals help as the basis for the disposition of assets or to enter into transactions such as settlements, re-structures, or foreclosure actions.

4. What types of personally identifiable information (PII) are (or may be) included in the information specified above? *(This is not intended to be an all-inclusive list. Specify other categories of PII, as needed.):*

PII Element	Yes	No
Full Name	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Date of Birth	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Place of Birth	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Social Security Number	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Employment Status, History or Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Mother’s Maiden Name	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Certificates (e.g., birth, death, naturalization, marriage, etc.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Medical Information (Medical Records Numbers, Medical Notes, or X-rays)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Home Address	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Phone Number(s) (non-work)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Email Address (non-work)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Employee Identification Number (EIN)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Financial Information (Loan Servicer's account number)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Driver's License/State Identification Number	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Vehicle Identifiers (e.g., license plates)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Legal Documents, Records, or Notes (e.g., divorce decree, criminal records, etc.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Education Records	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Criminal Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Military Status and/or Records	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Investigation Report or Database	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Biometric Identifiers (e.g., fingerprint, voiceprint)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Photographic Identifiers (e.g., image, x-ray, video)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other (Specify: _____)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

5. If Social Security Number (SSN) is checked in question 4, please answer the following:

- a) Explain the business purpose requiring the collection of SSNs: N/A
- b) Provide the legal authority which permits the collection of SSNs. N/A
- c) Identify whether the SSN is masked or otherwise truncated within the system: N/A

6a. Please provide an estimate of the number of records maintained by the vendor for this contract that contain PII:

Estimated Number of Records Containing PII				
0	1-500 as of 08/10/16	501-1,000	1,001 - 2,500	2,501 - 5,000
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5,001 - 7,500	7,501 - 10,000	10,001 - 50,000	50,001 - 100,000	over 100,000
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

6b. If "0" was answered for 6a, please explain³: N/A

7. What are the sources of data (both PII and non-PII) for the outsourced service/project? How is the data derived?

Data Source ⁴ (List all sources that the Outsourced Provider collects, obtains or receives data from, as part of the services provided under the contract.)	Type of Data Provided by Source & How It is Derived (Describe the type of PII and non-PII data provided by each source. If PII is included in the data, list the specific PII elements, and explain how the PII is derived.)	Does Data Include PII?
Collected from FDIC system(s)/application(s)	FDIC/DRR personnel collect data for assets in receivership from failed FIs containing the PII mentioned in question 4. FDIC/DRR submits appraisal requests to Allstate in the form of Excel Spreadsheets via the FDIC Secure Email Service. Allstate uploads the appraisal requests onto ExactBid and Global DMS. Additionally, the FDIC may also upload additional appraisal data to ExactBid and Global DMS upon request from Allstate. Data may	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

³ If the vendor has not received work to date for this contract and "0" is checked in 6a, please explain approximately how many records may be maintained by the vendor if they are awarded work under this contract in the future. Additionally, the Division responsible for this vendor must update this PIA to reflect the accurate number of records containing PII that the vendor maintains if this changes in the future.

⁴ Examples of potential data sources include, but are not limited to: internal (FDIC) or external (non-FDIC) systems, websites, individual members of the public (e.g., customers, borrowers, etc.), FDIC employees, FDIC contractors, credit bureaus, commercial entities, public records, government agencies, etc.

	include the property or home addresses, and the 4C Asset ID Number.	
Collected from Loan Servicer(s) and Interim Servicer(s)	Specific Loan Servicers manage residual loans from failed FIs on behalf of FDIC/DRR. The managed loans are the result of receiverships which were either not sold to AIs, or not auctioned. The Loan Servicers prepare order requests on Excel spreadsheets and email these requests to Allstate. Allstate emails these requests to FDIC/DRR's oversight manager (OM) to request authorization to proceed with ordering the appraisals. Data elements that may be provided by the loan servicer may include the PII elements from the acquired loan file already with the loan servicer such as: borrower, property owner, or property tenant full name, property address, contact information to gain access to the property (phone number and/or email address) and the loan servicer's account number.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Collected from Third-Party Appraisers	<p>For commercial property appraisals, ExactBid is used by Allstate to engage the services of outside third-party appraisers by soliciting bids and choosing from prospective bidders based on the appraisal criteria required by Allstate (i.e. sample appraisals by the third-party appraiser, credentials, price, turnover time, and location of property). All bids are documented; bidding data provided to the third-party appraisers may include appraisers' business names, identified points of contact, business phone numbers, dates and amounts of the bids, and assets for which the bid was submitted. Appraisal reports generated from the third-party appraisers may include the property or home address. Once the third-party appraisers complete the appraisals, the appraisal reports are uploaded to ExactBid for Allstate's review. Allstate's personnel pull the completed third-party appraisals from ExactBid, review the appraisal reports for completeness and accuracy, and provide the reports to FDIC/DRR by uploading the reports back to ExactBid.</p> <p>For residential appraisals, Allstate utilizes the automated Global DMS application. Allstate's personnel pull the completed residential appraisals from Global DMS, review the appraisal reports for completeness and accuracy, and provide the reports to FDIC/DRR by uploading the reports back on Global DMS. Addresses of property owners may be included in the residential appraisal reports received by Allstate from Global DMS.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

8. How will FDIC and/or the Outsourced Service Provider retrieve data or records as part of the outsourced service or project? Can data be retrieved using a personal identifier (e.g., name, address, SSN, EIN, or other unique identifier)?

When Allstate receives initial FI asset appraisal data from FDIC/DRR via the FDIC Secure Email Service, the records contain an assigned unique FDIC identifier (FDIC 4C Asset ID Number). Authorized Allstate personnel retrieve records on ExactBid using unique identifiers such as the property address, home address, borrower name, or property owner name (if applicable).

9. In the Federal Register, under which Privacy Act Systems of Record Notice (SORN) does this system operate? Provide number and name.

FDIC Privacy Act SORN 30-64-0013, *Insured Financial Institution Liquidation Records*.



This completes the PTA.

- Do not complete the rest of the form, if the service provider is not processing or maintaining sensitive PII. This is the case, if you checked:
 - NOT APPLICABLE for question 3 and NO for all items in question 4; OR
 - Only Full Name in question 4.

- Continue completing the remainder of the form, i.e., Sections III thru VI in their entirety (questions 10 through 18), if the service provider is processing or maintaining sensitive PII. This is the case, if you checked:
 - YES for Social Security Number (SSN) in question 4; OR
 - YES for SSN or for Full Name in addition to one or more boxes in question 4.

- If you have questions or are unsure about whether or not you should complete the remainder of this form, please contact your Division ISM or the Privacy Program Office (privacy@fdic.gov).

SECTION III – DATA ACCESS AND SHARING

10. In the table below, specify the systems/applications and parties (FDIC and non-FDIC) that will access or receive PII data as part of the outsourced service/project. (Check “No” or “Yes” for each category. For each category checked “Yes,” specify who will have access to, be provided with, or maintain the PII, what PII elements will be accessed/shared/maintained by them, how the access or sharing will occur, and the purpose and use of this PII.)

PII Will Be Accessed By and/or Provided To:	Yes	No	If Yes, Explain How and Why the PII Will Be Accessed/Shared
10a. FDIC Outsourced Service Provider (OSP) Staff; OSP Subcontractors; and/or OSP Systems	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Allstate receives appraisal orders from FDIC/DRR for assets in receivership in the form of an Excel Spreadsheet. Data elements may include the 4C Asset ID Number and property or home address. Allstate engages the services of outside state-licensed and certified third-party appraisers by soliciting bids and choosing from prospective bidders based on the appraisal criteria required by Allstate (i.e. sample appraisals by the third-party appraiser, credentials, price, turnover time, and location of property). Once the third-party appraiser has completed the appraisals, the appraisal reports are uploaded to ExactBid for Allstate’s review. Allstate’s personnel pull the completed third-party appraisals from ExactBid, review the appraisal reports for completeness and accuracy, and provide the reports to FDIC/DRR by uploading the reports back to ExactBid. Full names and addresses of property tenants may be included in appraisal reports received by Allstate from the third-party appraisers. For residential appraisals, Allstate utilizes the automated Global DMS application. Allstate’s personnel pull the completed residential appraisals from Global DMS, review the appraisal reports for completeness and accuracy, and provide the reports to FDIC/DRR by uploading the reports back to Global DMS. Borrower name and address of the property may be included in the residential appraisal reports received by Allstate from Global DMS. Access to ExactBid and Global DMS is maintained by Allstate’s IT Access Control teams.</p>
10b. FDIC Personnel and/or FDIC Systems/Applications	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>FDIC/DRR requires access to ExactBid and Global DMS for the OM, Technical Monitor (TM), and other individuals within FDIC/DRR as requested by the OM and TM. Allstate provides these personnel with login and password information so they can access the appraisal reports within ExactBid and Global DMS.</p> <p>The FDIC submits appraisal order forms to Allstate via secure email. Allstate provides the completed appraisal reports to the FDIC via ExactBid and Global DMS, which provide controlled access for specially designated FDIC personnel. The FDIC Franchise and Asset Marketing Branch (FAMB) has access to the data for the purpose of marketing and selling failed FI assets. DRR Owned Real Estate (ORE) and Loan Asset Management have access to the appraisal data for asset management purposes. FDIC Contract Oversight has access to the data for quality control and problem resolution.</p>

			The FDIC posts additional appraisal data, documents, and photographic images (as needed) directly to ExactBid and Global DMS. The FDIC retrieves residential property appraisal reports from Global DMS and commercial property appraisal reports from ExactBid. Only individuals with full FDIC background clearances that have signed all confidentiality agreements have access to this information.
10c. Individual Members of the Public (e.g., bidders, investors, borrowers, customers, etc.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not applicable.
10d. Other Non-FDIC Entities/ Parties and/or Non-FDIC Systems/Applications	<input type="checkbox"/>	<input type="checkbox"/>	<p>Marketing & Management (M&M) contractors⁵ The appraisal reports are reviewed and posted to ExactBid and Global DMS and may be accessed by the FDIC's Marketing & Management (M&M) contractors via user name and passwords which are controlled by Allstate's personnel. M&M contractors have access to the data for ORE property management and sales purposes. Access to the appraisal folders on ExactBid and Global DMS is restricted to persons approved by the TM.</p> <p>Loan Servicers Specific Loan Servicers manage residual loans from failed FIs on behalf of FDIC/DRR. The managed loans are the result of receiverships which were either not sold to AIs, or not auctioned. The Loan Servicers prepare order requests on Excel spreadsheets and email these requests to Allstate. Allstate emails these requests to FDIC/DRR's OM to request authorization to proceed with ordering the appraisals. Data elements that are provided by the loan servicer may include the PII elements from the acquired loan file already with the loan servicer such as: borrower, property owner, or property tenant full name, property address, contact information to gain access to the property (phone number, and/or email address) and the Loan Servicer's account number.</p>
10e. Federal, State, and/or Local Agencies	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not applicable.
10f. Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not applicable.

11. If data will be provided to, shared with, or maintained by non-FDIC entities (such as government agencies, contractors, or Outsourced Information Service Providers), have any of the following agreements been issued?

Data Protection and/or Sharing Agreements	Yes	No
FDIC Confidentiality Agreement (Corporation)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
FDIC Confidentiality Agreement (Individual)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Non-Disclosure Agreement (NDA)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Memoranda of Understanding (MOU)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Information Sharing Agreements (ISA)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Authentication Risk Assessment	<input type="checkbox"/>	<input checked="" type="checkbox"/>

⁵ FDIC ORE properties are managed and marketed by ORE Management and Marketing (ORE M&M) vendors and/or FDIC Account Officers. ORE M&M vendors are engaged to manage, market, and sell FDIC assets. Asset portfolios include the following types of property: Bank Premises, Commercial, Land (improved and unimproved), Single Family (1-4 units), Multifamily, Mixed (combination of multifamily and retail), and other assets within FDIC's capacity. For more information on the FDIC ORE M&M vendors, please refer to the ORE M&M Services Privacy Impact Assessment at www.fdic.gov.

Other Applicable Agreement(s) (Specify: _____)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>If you answered NO to any item above, please provide additional information if available: Allstate and the third-party appraisers they utilize are outsourced service providers, therefore they are not subject to MOUs or ISAs.</p>		

SECTION IV – NOTICE AND CONSENT

12. Do individuals have the opportunity to decline to provide information or to consent to particular uses of their information (other than required or authorized uses)?

No. Individuals do not have the opportunity to “opt out” of providing their data and/or consenting to particular uses of their information. ***(Explain why individuals are not able to opt out (either for specific data elements or specific uses of their data.):***

Yes. Individuals have the opportunity to decline to provide their personal data or to consent to particular uses of their information. ***(Explain how individuals may decline or consent to the use of their information.):***

Not applicable. Information is not collected directly from individuals.

13. If PII is being collected via a public-facing website and/or application as part of this outsourced service, has the Outsourced Information Service Provider posted any of the following types of privacy policies or Privacy Act notices?

- No
- Yes *(If yes, check applicable box(es) below.)*
 - Link to FDIC Privacy Policy
 - FDIC Privacy Act Statement
 - Contractor Privacy Policy or Statement
 - No Privacy Policy has been posted
- Not applicable

SECTION V – DATA SECURITY AND ACCURACY

14. Please assert what administrative procedures and technical safeguards are in place to protect sensitive PII data in the Outsourced Information Service Provider’s care. *[Provide the name of the Outsourced Service Provider and check all applicable box(es).]*****

Allstate Appraisal LP 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. If it has gone through the Methodology, has it been approved? NO YES

The FDIC conducts background investigations (BIs) on Allstate Appraisals, LP personnel and other applicable personnel prior to their beginning work on the contract.

Allstate Appraisal LP is subject to periodic compliance reviews by FDIC. Per the contract, scheduled and unannounced inspections and assessments of the Outsource Service Provider'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.

Other (Explain any other administrative and/or technical safeguards in place to protect PII data in the Outsourced Information Service Provider's care.)

15. What are the procedure(s) for ensuring that the information maintained is accurate, complete and up-to-date? [Check all applicable box(es) and insert the appropriate response and System/Project name.]

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.

The vendor/contractor 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 administrator 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.

Other (*Please explain.*)

16. In terms of assuring proper use of the data, please assert whether the following statements are true for the Outsourced Information Service Provider. (Check all applicable box(es) and insert the name of the Outsourced Information Service Provider and title of the firm's senior management official.)

Within FDIC, Allstate's 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, the Outsourced Information Service Provider is responsible for assuring proper use of the data. Policies and procedures have been established to delineate this responsibility, and the vendor has designated managing partners and program managers to have overall accountability for ensuring the proper handling of data by vendor personnel who have access to the data. All vendor 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 the vendor's corporate policies for data protection.

Access to certain data may be limited, depending on the nature and type of data. (Refer to Section III of this Privacy Impact Assessment for more information on data access criteria.)

The Outsourced Provider must comply with the Incident Response and Incident Monitoring contractual requirement.

None of the above. *(Explain why no FDIC staff or Outsourced Information Service Provider personnel have been designated responsibility for assuring proper use of the data.)*

SECTION VI – DATA RETENTION AND DISPOSAL

17. Where will the Outsourced Service Provider store or maintain the PII data identified in question 4? Describe both electronic and physical storage repositories, as applicable.

Data is stored electronically and maintained on ExactBid and Global DMS which requires Allstate's IT Access Control team-administered usernames and passwords. Datacenters that Allstate utilizes for backups are all within the United States. These datacenters are secured using biometrics, security personnel, and mantrap entrances. There is no physical storage of FDIC data by Allstate.

18. Specify the period of time that data is retained by the Outsourced Service Provider and the specific procedures for disposing of or returning the data at the end of the retention period or contract, whichever is first.

Allstate retains appraisals and reviews on ExactBid and Global DMS for three years following final payment in accordance with the FDIC contract. FDIC appraisal orders and supporting information is maintained until the assets are purchased by an AI, at which time they are retired or destroyed in accordance with the National Archives and Records Administration (NARA) and FDIC Records Retention and Disposition Schedules.