

PRIVACY IMPACT ASSESSMENT

Bridger Insight XG Service (BRIDGER INSIGHT)

September 2013

FDIC External Service

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System Overview

FDIC Division of Resolutions and Receiverships (DRR) promotes confidence in the nation's financial system by paying insured depositors quickly and effectively managing failed banks. DRR utilizes both employees and contractor staff to achieve its mission and ensure DRR's continued readiness to handle all aspects of bank closings.

Bridger Insight XG Service is a software/web portal developed by LexisNexis that is used to support DRR's resolution and liquidation activities. The primary business function provided by Bridger Insight is to facilitate FDIC's compliance with the U.S. Patriot Act via Office of Foreign Assets Control (OFAC), a component of the Treasury Department that administers and enforces more than 20 economic sanctions programs against targeted foreign countries, terrorists and terrorist organizations, narcotics traffickers, persons engaged in activities related to the proliferation of weapons of mass destruction, and others. These OFAC sanctions programs are authorized by Executive Orders and Acts of Congress to prohibit a variety of transactions and block assets of targeted persons and entities.

All persons and entities within the United States must comply with OFAC regulations, including U.S. citizens and permanent resident aliens, regardless of where they reside, and all U.S. incorporated entities, including foreign branches. In cases of certain programs, such as those regarding Cuba and North Korea, all foreign subsidiaries owned or controlled by U.S. companies must **also** comply.

Pursuant to a Memorandum of Understanding (MOU) between the FDIC and OFAC, the FDIC, as the appointed receiver of failed institutions, will take appropriate measures to verify that no assets are sold and no insured deposits are disbursed to individuals, entities or countries targeted by OFAC-administered sanctions programs. Failed institutions' assets and deposit liabilities, as well as asset sale bidders are screened against the five (5) below-mentioned watch lists:

- SDN-OFAC – Specially Designated Nationals
- NON-SDN – OFAC Non-SDN Entity List
- COUNTRY – OFAC Sanctioned Countries
- BIS – The Bureau of Industry and Security of the U.S. Department of Commerce
- DTC – The list of debarred parties administered by the Department of State

Personally Identifiable Information (PII) in BRIDGER INSIGHT

BRIDGER INSIGHT will contain personally identifiable information (PII) such as: Full name, date of birth, place of birth, Social Security Numbers (SSNs), home address, phone number (non-work), and Employee ID Number (EID).

Purpose & Use of Information in BRIDGER INSIGHT

The FDIC, as the appointed receiver of failed institutions, must take appropriate measures to verify that no assets are sold and no insured deposits are disbursed to individuals, entities or countries targeted by OFAC-administered sanctions programs. In this regard, FDIC/Claims staff uploads a text file with the PII to one or more entities included (i.e. borrowers/customers of failed financial institutions,

bidders or investors, and/or Agents or lawful successors of depositors of failed institutions) into Bridger Insight's web portal in order to screen failed institution assets and deposit liabilities, as well as potential bidders/investors, against the OFAC watch lists. The PII specified is necessary to ensure accuracy and compliance with the U.S. Patriot Act.

Sources of Information in BRIDGER INSIGHT

Information in BRIDGER INSIGHT is derived from a wide range of sources, including:

Owned Real Estate (ORE) - Authorized FDIC/DRR Claims staff receives PII data about potential bidders/investors via secured email from internal DRR Division ORE Core/Environmental. PII data is collected from prospective and winning purchase bidders via online registration forms or Live Outcry Auctions individuals where names are verified against the OFAC list via Bridger Insight. The secured file includes the following PII about bidders or investors and borrowers: names, social security numbers (SSNs)/taxpayer identification numbers (TINs), home addresses, telephone numbers, and dates of birth. The result of the OFAC check is filed in the official Asset Management/Marketing file.

Asset Marketing – Authorized FDIC/DRR Claims staff receives PII data about potential bidders/investors via secured email from internal DRR Division Asset Marketing. Claims staff verifies potential bidders and borrowers against the OFAC list via Bridger Insight, before the sale can be final. The result of the OFAC check is returned to Asset Marketing staff, where it is saved on the internal network share drive.

Legal - Authorized FDIC/DRR Claims staff receives PII data about potential bidders/investors via secured email from internal FDIC Department Legal (Assets Disposition Section). Claims staff verifies any potential buyers for any structure sales purchase against the OFAC watch lists via Bridger Insight.

Authorized FDIC/DRR Claims staff uploads the data as a text file into the Bridger Insight website for verification against the OFAC lists. The file includes the following PII about bidders or investors and borrowers: names, social security numbers (SSNs)/taxpayer identification numbers (TINs), home addresses, telephone numbers, and dates of birth. The data file is not saved on the Bridger Insight servers, as the data file is deleted automatically after the "scan" is completed.

Failed Financial Institutions (Borrowers/Customers) – Authorized FDIC/DRR Claim staff receive PII data about borrowers/customers of the failed institution via the FDIC/DRR Closed Bank SharePoint site, where authorized FDIC/DRR Business Information Systems (BIS) Staff place the data regarding the customers/borrowers from failed financial institutions. Authorized FDIC/DRR Claims staff upload the data as a text file into the Bridger Insight website for verification against the OFAC lists. DRR Claims staff notifies the DRR BIS staff via email with the result. The file includes the following PII about customers of failed institutions: names, SSNs/TINs, home addresses, telephone numbers, and dates of birth.

Notice & Consent

Information about borrowers/customers is collected from failed institution records, not directly from the individuals. In such cases, individuals do not have the opportunity to “opt out” of providing their data. Additionally, the FDIC is required to screen the names of depositors to verify that no assets or insured deposits are disbursed to individuals, entities or countries targeted by OFAC-administered sanctions programs. Therefore, no opt-out opportunity is provided. This screening process is required to ensure compliance with the U.S Patriot Act and the Office of Foreign Asset Control (OFAC) requirements.

However, in cases where personal information about potential bidders/investors is collected directly from these individuals, they do have the opportunity to decline to provide their personal data or to consent to particular uses of their information. Individuals are informed at the time of data collection that they must meet certain eligibility requirements in order to participate in FDIC asset/ORE sales.

Access to Data in BRIDGER INSIGHT

Authorized internal FDIC Divisions/Departments, including the Legal Division and Departments within DRR have access to the PII in BRIDGER INSIGHT. These include: Account (ORE), Credit, and Closed Banks. These Divisions/Departments securely provide via internal FDIC email the PII to FDIC/DRR Claims Specialists who convert and upload the PII to Bridger Insight in order to initiate the OFAC check. Upon completion of the OFAC check, FDIC/DRR Claims staff will receive the results and notify the internal Division/Department with an email stating that match was identified or that there was no match. Emails are secured appropriately when they contain the names of individuals who were identified as a match on any OFAC watch lists. Authorized FDIC/DRR Business Information Systems (BIS) Staff upload failed bank data to a Closed Bank SharePoint Site.

Authorized staff members at Bridger Insight who serve as server administrators and database administrators provide service for FDIC data, but do not have access to FDIC data files, as these data files are automatically deleted after the OFAC scan is completed. Bridger Insight administrators are responsible for ensuring that all OFAC watch lists are up-to-date daily and perform regular maintenance activities on the Bridger Insight environment.

Data Sharing

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

System Name	System Description	Type of Information Processed
Closed Bank SharePoint Site	DRR BIS Staff upload failed bank data to a Closed Bank SharePoint Site.	Failed bank data

Data Accuracy in BRIDGER INSIGHT

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

Data Security for BRIDGER INSIGHT

Bridger Insight XG Service (LexisNexis) 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.

System of Records Notice (SORN)

Bridger Insight operates under FDIC SORN 30-64-0013, *Insured Bank 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.

