FDIC FEDERAL DEPOSIT
INSURANCE CORPORATION
INSURING AMERICA'S FUTURE

PRIVACY IMPACT ASSESSMENT

FDIC Automated Corporate Tracking System (FACTS)

March 2012

FDIC Internal System

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System Overview

The FDIC's Automated Corporate Tracking System (FACTS) is a web-based tracking tool used by multiple FDIC Divisions and Offices to log and route inquiries, requests for FDIC information and services, business recommendations, general correspondence and internal memoranda that require follow-up action and/or management approval. Inquiries and requests are received from a variety of internal and external parties, and relate to both Corporate and Receivership activities, as detailed below.

There are currently two versions of Facts used by FDIC:

1. The original version was built for use by the Division of Resolutions and Receiverships (DRR) to track service requests, inquiries and business cases related to financial institution resolution and receivership activities. Examples of service requests, inquiries and cases tracked in this version of FACTS include: (a) the release of collateral for customers of failed financial institutions; (b) claims of customers and/or vendors of failed financial institutions; (c) Freedom of Information Act (FOIA), Chairman, Government and Public Relations requests for DRR-related information; and (d) recommendations for DRR business issues, resolution issues, delegations of authority, claims and other matters which are presented to management, senior management or the Board of Directors for approval.

2. The second version of FACTS is for Corporate use and is used by multiple FDIC Divisions/Offices. This version provides the same general document tracking functions as the DRR version, but serves purposes that are not necessarily related to financial institution resolution activities. Examples of the Corporate version of FACTS include logging and routing requests and inquiries such as: FOIA requests from the public and other entities; Congressional requests for Corporate data; FDIC executive or Board member requests for information or reports; requests from media/reporters; diversity inquiries and complaints from employees that require action; letters, internal memoranda, and waivers that require review, comment, and/or approval of senior management officials.

Requests and cases are manually entered into FACTS by authorized users in each unit and assigned to Delegations of Authority (DOAs) and Individual Delegation of Authority (IDA) for completion and approval. Authorized users can attach documents to a FACTS request or case. The documents may contain personally identifiable information (PII) and are stored in the FDIC Digital Library (FDL) or Consolidated Document Information System (CDIS). These documents may not be stored in FACTS.[1] Additionally, depending on the version of FACTS users access, there is the option to view and attach to cases data from other internal FDIC systems and databases. Examples include asset-related data from the Communication, Capability, Challenge, and Control-Asset Servicing Technology Enhancement Project (4C-ASTEP); unclaimed deposit payments from the Dividend Processing System (DPS); failed financial institution from the Closed Institution Database (CID); Power of Attorney documents; and non-PII data about failing financial institutions from the Structure Information Management System (SIMS).

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[1] In order to use FACTS and access any attached documents, a user must be authorized to use FACTS as well as FDL and CDIS.

As mentioned above, the majority of the data in FACTS is input manually and processed by authorized FDIC staff and contractors. Depending on the type and nature of the case or request, this information may be received directly from the requestor or other pertinent parties via telephone, email, mail, or fax. Additionally, the DRR version of FACTS hosts an external web-based inquiry form to allow customers of failed financial institutions to submit queries to the FDIC. When individuals complete and submit the online inquiry form, the data provided on the form is electronically uploaded and populated in FACTS for review and processing by authorized DRR users.

Personally Identifiable Information (PII) in FACTS

FACTS may contain personally identifiable information (PII) and non-PII about FDIC employees, contractors, and members of the public from the following primary categories:

1. **FACTS User/Assignee Information:** Employee/Contractor name, Title, Office, and Email Address. In addition, FACTS associates the following information with a user profile: Employee/Contractor Unit, and Requests/Cases Worked On.

2. **Requestor/Inquirer Information:** Name, Company Name, Address (Home or Work), Email Address (Home or Work), Telephone Number (Home or Work), Employee Identification Number, Fax Number, and Synopsis of Inquiry or Requests. The web-based form filled out by the customer or by another party (i.e. relative) on behalf of the customer in regards to requesting information from a failed financial institution captures: Full Name, Email Address (Home or Work), Telephone Number (Home or Work), and a Summary of the Question/Inquiry. The form instructs individuals not to provide unnecessary or sensitive PII.

3. **Case Information & Attached/Associated Information:** The nature and type of cases in FACTS are varied and may relate to Corporate and Receivership activities[2]. A case write-up and attachments in FACTS may include sensitive information and/or PII about internal or external parties that are necessary to appropriately resolve the matter. PII and non-PII may include: Name, Address (Home or Work), Email Address (Home or Work), Telephone Number (Home or Work), Social Security Number (SSN), Loan Information, Legal Documents or Records, Asset Number, Financial Institution Number (FIN), Financial Institution Name, Financial Records, Account Number and Power of Attorney, if applicable.

Purpose & Use of Information in FACTS

The data in FACTS is both relevant and necessary for the purpose for which the system was designed, namely to support critical business functions, such as to assign and search for requests/cases by Unit or Author, as well as run reports on

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[2] For example, a case in the DRR version of FACTS might pertain to matters related to the resolution and receivership of a failed institution, such as: asset management, subsidiary, risk sharing asset management (RSAM), failed institution employee benefits, failed institution strategic operations, receivership oversight and strategic operations, owned real estate (ORE), legal opinions, DRR investigation, etc.

user workload productivity. Additionally, the information is needed to appropriately track, route and respond to an inquiry or request.

Sources of Information in FACTS

The information derived in FACTS is manually entered by authorized FDIC users assigned to work on particular inquiries, requests, cases, or other items. In order to resolve requests or inquiries, PII may be obtained directly from the requestor/inquirer and entered into FACTS by authorized FDIC users. Depending on the type and nature of the case, inquiry or request, this information may be received via telephone, email, mail, or fax. Additionally, the external web-based inquiry form allows customers of failed financial institutions to submit inquiries directly to FDIC. This data is uploaded electronically and populated in FACTS for review and processing by authorized DRR users.

Attachments, which may contain PII, are extracted from FDL or CDIS. Additionally, depending on the version of FACTS users access, the option to view and associate (i.e. attach) to cases/requests data is extracted from other internal FDIC systems and databases, such as asset-related data from 4C-ASTEP, unclaimed deposit payments from DPS, failed financial institution data from CID, non-PII data about failing financial institutions from SIMS, and Power of Attorney data, if applicable.

Notice & Consent

Individuals do not have the opportunity to "opt out" of providing their information for inclusion in FACTS. The information maintained in FACTS is necessary to track and resolve requests, inquiries, cases or other matters related to Corporate and Receivership activities.

Access to Data in FACTS

Authorized employees and contractors in the following FDIC Divisions and Offices have access to FACTS: Division of Finance (DOF), Division of Information Technology (DIT), Division of Resolutions and Receiverships (DRR), Division of Risk Management Supervision (RMS), Division of Depositor and Consumer Protection (DCP), Legal Division, Office of Minority and Women Inclusion (OMWI), Office of Inspector General (OIG), and Office of Public Affairs (OPA). OIG may be granted "view only" access to certain units in FACTS for legitimate business functions, such as routine investigation work.

Each FDIC Division/Office has a set of authorized users who are assigned to work on, review and approve particular requests and cases in FACTS. These users are organized into working groups or "Units". Users may only access items that are within their own Unit, unless a Manager assigns them access to items outside their Unit. All FDIC employees and contractors must have Supervisor and Manager approval to gain access.

Data Sharing

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

System Name	System Description	Type of Information Processed
4C-ASTEP	4C is an integrated data sharing system for asset servicing, marketing and resolution needs.	4C Control Number, Asset Number, Asset Name, Gross Book Value, and Financial Institution Number (FIN)
Dividend Processing System (DPS)	A system designed to assist calculating, issuing and reconciling payments to proven claimants.	Full Name, Address (Home or Work), Social Security Number (SSN), Vendor Identification Number, Claim Records and Financial Records
Closed Institution Database (CID)	CID contains information pertaining to failed financial institutions.	FIN, FIN Name, City and State
CORPEDWDB	A database that provides a list of Congressional members.	Name of Congressional members
FDIC Digital Library (FDL)	A corporate electronic repository for the storage and management of FDIC electronic documents.	Full Name, Date of Birth, Social Security Number (SSN), Driver's license/state identification number, Employee Identification Number, Mother's Maiden Name, Vehicle Identifiers, Home Address, Phone Numbers (non-work), E-mail address (non-work), Financial Records, Legal Documents and Records, Education Records, Employment Records and Background Investigative Data
Consolidated Document Information System (CDIS)	CDIS is a corporate document management system that provides users the ability to create and manage FDIC corporate content based on their organizational profile and security privileges.	Attached documents pertaining to a FACTS request or case; may contain sensitive PII
Structure Information Management System (SIMS)	SIMS is the FDIC system of record for structure data, which includes demographic, event, classification, and ownership data for financial institutions.	Bank structure data
Multi-tier Application Architecture Project (MAAPCO)	A Microsoft's Message queue architecture designed to provide scalability and functionality with acceptable response time within varied FDIC user environment.	Name, SSN, Business Address, Business Phone Number, and Business E-mail Address
KeyCorp	A third-party service retained by the FDIC to assist with general loan administration and collection services for Commercial Loans, collateralized and classified as real estate and non-real estate.	Name, Date of Birth, SSN, Home Address, Phone Number (non-work), E-mail Address (Home or Work), Financial Information, Driver's License/State Identification Number, Vehicle Identifiers, Legal Documents, and Photographic Identifiers
Midland Loan Services	A third-party service retained by the FDIC to assist with general loan administration and collection	Name, Date of Birth, SSN, Birth Certificates, Home

System Name	System Description	Type of Information Processed
(MIDLAND)	services for Commercial Loans, collateralized and classified as real estate and non-real estate.	Address, Phone Number (non-work), E-mail Address (Home or Work), Financial Information, Driver's License/State Identification Number, Vehicle Identifiers, Legal Documents, and Photographic Identifiers
NationStar Mortgage, LLC	A third-party service retained by the FDIC 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.	Name, SSN, Home Address, Phone Number (Home or Work), E-mail Address (Home or Work), Birth and Death Certificate Information, Financial Records, Driver's License/State Identification Number, Vehicle Identifiers, Legal Documents, Military Status, Investigation Records and Photographic Identifiers
NewTek Business Services	A third-party service retained by the FDIC to provide external Consulting and Loan Servicing services for government-backed and other related loan products to maximize recovery on all such assets acquired in a receivership transaction and expedite the return of the assets to the marketplace via asset sales.	Name, SSN, Home Address, Phone Number (Home or Work), E-mail Address (Home or Work), Place of Birth, Date of Birth, Financial Records, Driver's License/State Identification Number, Vehicle Identifiers, Legal Documents, Military Status, Education Records, Criminal Information, and Investigation Records
Prescient, Inc.	A third-party service retained by the FDIC to assist with the acquisition, research, preparation for marketing, management, marketing and final disposition of all types of real property acquired by the FDIC in its Receivership capacity when a Financial Institution fails.	Name, Home Address, Phone Number (Home or Work), E-mail Address (Home or Work), SSN, Employment Status, Financial Records, Driver's License/State Identification Number, Vehicle Identifiers, and Legal Documents

Data Accuracy in FACTS

FDIC authorized employees and contractors manually input requests, inquiries, cases and other matters into FACTS. Customers/requestors or other members of the public may contact FDIC directly via telephone, email, mail, etc.; the data is verified and checked for completeness while providing support to those customers/requestors or other members of the public.

Additionally, automated checks are established to ensure completeness of the data provided by customers of failed institutions via the external web-based inquiry form. The form must be completed in its entirety to be processed; if left incomplete, an automated alert is generated notifying the customer that the missing information must be provided to complete the submission process.

Data Security for FACTS

Requests, inquiries, cases, and other matters are manually entered into FACTS by authorized FDIC employees and contractors. Inquiries may be received from customers of failed institutions via an external web-based inquiry form that electronically transmits data provided on the form into FACTS. The FDIC has controls and special character filtering in place to ensure that any data input or electronically transmitted into FACTS is free from viruses. The FDIC also has software controls to ensure that the data complies with processing requirements.

FDIC employees and contractors must complete FDIC's annual Information Security and Privacy Awareness training. Contractors must sign an annual Contractor Confidentiality Agreement to be granted access to this system for the purpose of maintenance support and development of new requirements in the FACTS system. Additionally, a user's access to FACTS is deactivated after 30 days of inactivity.

System of Records Notice (SORN)

FACTS operates under the following FDIC Privacy Act SORNs:

- FDIC 30–64–0015 *Personnel Records*.
- FDIC 30–64–0018 *Grievance Records*
- FDIC 30-64-0022 *Freedom of Information Act and Privacy Act Requests Records*
- FDIC 30-64-0028 *Office of the Chairman correspondence Records*
- FDIC 30-64-0029 *Congressional Correspondence Records*
- FDIC 30-64-0005 *Consumer Complaint and Inquiry Records*
- FDIC 30-64-0013 *Insured Financial Institution Liquidation Records*
- FDIC 30-64-0024 *Unclaimed Deposit Account Records*
- FDIC 30-64-0012 *Financial Information Management Records*
- ODEO "EEOC/GOVT-1 Equal Employment Opportunity in the Federal Government Complaint and Appeal 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.