FDIC FEDERAL DEPOSIT
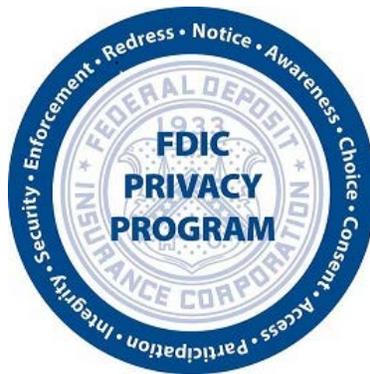INSURANCE CORPORATION
INSURING AMERICA'S FUTURE

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

for

Thomson Reuters (Tax & Accounting)

OneSource (eComply)

**Date Approved by Chief Privacy Officer (CPO)/Designee: 3/25/2013   **

PTA/PIA TEMPLATE VERSION 1.1 – August 2012

SECTION I – OUTSOURCED INFORMATION SERVICE DESCRIPTION

1. Describe the outsourced service and its purpose. *In your response, use simple, non-technical language to clearly explain the **business functions** that the outsourced service supports.*

The FDIC's Division of Finance (DOF) uses OneSource, also known as Fast-Tax 1099 eComply Software (eComply), to collect, manage, report, and distribute reportable tax information for both Corporate and Receivership activities. Specifically, OneSource currently processes Internal Revenue Service (IRS) 1098s, 1099s and Supplemental Payment W-2s, and produces statements for mailing to recipients[1] for tax reporting purposes. OneSource is also used to electronically report required transactions related to these tax forms to appropriate federal and state taxing authorities.

DOF selected OneSource to replace FDIC's previous 1099 software, as well as the FDIC's Supplemental Payment W-2 printing and mailing process. OneSource simplifies and streamlines the process of collecting 1099, 1098, and Supplemental W-2 data from various sources; concatenating the different data files; processing, printing, and mailing the forms to recipients; and electronically filing the forms with appropriate taxing authorities. OneSource also provides FDIC employees with the on-line capability to access and print their Supplemental W-2s thru the FDIC New Financial Environment (NFE) W-2 Self-Service function. To access the Self-Service W-2 functionality, the FDIC employee logs in to NFE using their network ID (NT ID) credentials and clicks on the link for W-2. The user is redirected to a custom web application where they are prompted to re-enter their NT ID credentials. These credentials are used to authenticate the employee and to allow the web application to retrieve the employee's name, social security number (SSN), and employee identification number (EIN), from the FDIC Corporate Human Resources Information System (CHRIS) HR database. In turn, these PII elements are used as the Key Fields to verify and access the employee's W-2 form in the OneSource/eComply database. The requested W-2 form is returned on-screen to the employee who has the option to print the file or save it as a PDF.

OneSource is an outsourced solution that is hosted and maintained at the secure facilities of the vendor, Thomson Reuters (Tax & Accounting). Data in the system is collected from several external sources and internal FDIC applications that generate 1098/1099 and W-2 information. (Please refer to Question 5 for details on the specific sources of information in the system.) The collected data is transmitted over a secure communication link (SSL) to the Thomson Reuters' data center. After the data is loaded into Thomson's secure database, authorized personnel from FDIC's DOF and Division of Resolutions and Receiverships (DRR) are able to review and correct the data as needed via a secure internet link to Thomson Reuters. Once the data has been reviewed and updated as necessary, Thomson Reuters generates and mails the tax documents to the recipients and also prepares an electronic file to transmit to the proper federal and state taxing authorities.

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[1] There are currently two primary categories of form recipients: (a) Corporate and (b) Receivership:

    a) **Corporate recipients** include current and former FDIC employees and vendors who receive Forms 1099 and/or Supplemental Payment W-2 statements. For example, W-2 forms are issued to current and former FDIC employees for all supplemental payments they received, such as taxable travel, relocation, lifecycle, etc. 1099s are issued to employees for any type of income outside of their original salary, such as legal settlements and Buyout Interest Payments. In addition, 1099s are issued to vendors for any services they provided to FDIC.

    b) **Receivership recipients** include customers and vendors of failed financial institutions in the FDIC's receivership in instances where there is a payout and/or the FDIC assumed the role of Interim Servicer. These recipients will receive 1098 and/or 1099 statements.

2. Status of the Outsourced Information Service Provider:

- ☐ Solicitation/On-Boarding (Pre-Award; or At/Around the Time of Contract Award)
- ☐ Initial Assessment/Due Diligence (Post-Award)
- ☒ Ongoing Monitoring of Contract (Post-Award)
- ☐ Sunset or Disposition of Contract (Post-Award; At or Near Contract Expiration)
- ☐ Other (*Explain*):

SECTION II – INFORMATION TYPE, SOURCES, AND USE

3. Will the Outsourced Information Service Provider collect, maintain or generate Personally Identifiable Information (PII) about individuals on behalf of FDIC? ☐ **NO** ☒ **YES** *(If yes, check ALL categories that apply. This is not intended to be an all-inclusive list. Specify other categories of individuals, as needed.):*

☒ FDIC Employees	☒ Borrowers/Customers of Failed Financial Institutions
☐ FDIC Contractors	☐ Claimants (Depositors or Non-Depositors)
☐ FDIC Visitors	☐ Receivership Payees or Payers*****
☐ Complainants	☐ Failed Bank Officers/Directors/Employees
☐ Requestors	☒ Failed Bank Creditors or Vendors*****
☐ Bidders or Investors*****	☒ FDIC Business Customers/Vendors*****

- ☐ Other *(Specify):*
- ☐ NONE *(No PII about individuals will be collected, maintained, or generated.)*

*Note: The asterisk is equivalent to individuals NOT businesses.

4. What specific types of PII will the Outsourced Information Service Provider collect, maintain or generate on behalf of FDIC? Also, what are the Sources of the PII? *(Check applicable box(es) below. This is not intended to be an all-inclusive list. Specify other categories of PII, as needed.)***:**

OneSource/eComply contains PII related to Corporate and Receivership activities as described below.

(a) Corporate activities – OneSource contains the following information about **current and former FDIC employees and vendors**; this information is necessary for processing and mailing recipients their 1099 and/or Supplemental W-2 tax-reporting statements, as well as for required reporting to appropriate federal and state taxing authorities:

- Employee/Vendor Full Name,
- Employee Home Address (if applicable)/Vendor Address (if applicable),
- Employment Status,
- Financial Information [e.g., dollar fields and information supplied on Supplemental W-2s and 1099 statements, such as payment amounts, supplemental Year-to-Date (YTD) wages, federal taxes paid, state taxes paid (if any), Old Age, Survivors, and Disability Insurance (OASDI) tax paid (if any), Medicare Tax paid (if any), 1099 income, etc.], and
- Taxpayer Identification Number (TIN) (if applicable) or Social Security Number (SSN) (if applicable).

(b) Receivership activities – OneSource also contains the following information about **customers and vendors of failed financial institutions in receivership** in instances where there is a payout and/or the FDIC has assumed the role of Interim Servicer; this information is required for sending applicable

1098/1099 statements to recipients, as well as reporting to appropriate federal and state taxing authorities:

- Bank Customer/Vendor Full Name,
- Bank Customer Home Address (if applicable)/Vendor Address (if applicable),
- Employment Status,
- Financial Information (i.e. dollar fields and information supplied on 1098/1099 forms, such as federal and state income tax withheld, payment amounts, etc.), and
- TIN (if applicable) or SSN (if applicable).

PII Element	Entered manually by authorized users	System-generated	Collected directly from individuals thru a form or other mechanism	Collected from FDIC system(s)/ application(s)	Collected from non-FDIC entities, system(s), or application(s)	Collected from federal, state, or local gov't agencies	Other collection method or mechanism
Full Name	☒	☐	☐	☒	☒	☐	☐
Date of Birth	☐	☐	☐	☐	☐	☐	☐
Place of Birth	☐	☐	☐	☐	☐	☐	☐
Social Security Number	☒	☐	☐	☒	☒	☐	☐
Employment Status, History or Information	☒	☐	☐	☒	☒	☐	☐
Mother's Maiden Name	☐	☐	☐	☐	☐	☐	☐
Certificates (e.g., birth, death, naturalization, marriage, etc.)	☐	☐	☐	☐	☐	☐	☐
Medical Information (Medical Records Numbers, Medical Notes, or X-rays)	☐	☐	☐	☐	☐	☐	☐
Home Address	☒	☐	☐	☒	☒	☐	☐
Phone Number(s) (non-work)	☐	☐	☐	☐	☐	☐	☐
Email Address (non-work)	☐	☐	☐	☐	☐	☐	☐
Employee ID Number	☐	☐	☐	☒	☐	☐	☐

Financial Information (e.g., checking account #/PINs/passwords, credit report, etc.)	☒	☐	☐	☐	☒	☐	☐
Driver's License/State Identification Number	☐	☐	☐	☐	☐	☐	☐
Vehicle Identifiers (e.g., license plates)	☐	☐	☐	☐	☐	☐	☐
Legal Documents, Records, or Notes (e.g., divorce decree, criminal records, etc.)	☐	☐	☐	☐	☐	☐	☐
Education Records	☐	☐	☐	☐	☐	☐	☐
Criminal Information	☐	☐	☐	☐	☐	☐	☐
Military Status and/or Records	☐	☐	☐	☐	☐	☐	☐
Investigation Report or Database	☐	☐	☐	☐	☐	☐	☐
Biometric Identifiers (e.g., fingerprint, voiceprint)	☐	☐	☐	☐	☐	☐	☐
Photographic Identifiers (e.g., image, x-ray, video)	☐	☐	☐	☐	☐	☐	☐
NONE.	☐	☒	☒	☐	☐	☒	☒
Other (Specify):	☐	☐	☐	☐	☐	☐	☐

5. How will the PII Elements in question 4 be *derived* from each Source? (*Provide specific details about who will provide the PII and how in the applicable columns below*).

5a. Entered manually by authorized users	The PII identified in Q4 is collected from several internal FDIC systems, as well external sources, and stored in Thomson Reuters' secure financial database known as OneSource (eComply). In some instances, this information is manually uploaded into OneSource by FDIC's DOF Receivables, Receipts, & Vendor Maintenance Group or by authorized Thomson Reuters staff, as detailed in Q5d and Q5e below.
5b. System-generated	**Not applicable.**
5c. Collected directly from individuals thru a form or other mechanism	**Not applicable.** The PII identified in Q4 is collected from internal FDIC systems/sources, US Banks' PCards, and Receivership Banks, as explained in Q5d and Q5e below.
5d. Collected from FDIC system(s)/ application(s)	Some of the PII identified in Q4 is derived from the following internal FDIC systems/sources and stored in the Thomson Reuters' OneSource database. Specifically, FDIC's DOF Receivables, Receipts, & Vendor Maintenance Group receives files containing the PII identified below via encrypted email or secure download from the following internal FDIC systems and sources, and manually uploads these files into OneSource via secure transmission: • **FDIC Dividend Processing System (DPS)**[2] provides a file containing dividend payment information related to Receivership activities for tax reporting purposes. Information contained in this file includes, for example: Full Name, Address, TIN/SSN, and payment information for customers/vendors of failed financial institutions who received dividend payments from FDIC. • **FDIC New Financial Environment (NFE) PeopleSoft Accounts Payable (PS/AP)** module provides a file containing payment information for Corporate-related 1099 tax forms and reporting purposes. Information contained in this file pertains to Corporate activities and includes, for example: Full Name of Recipient of Payment, Address, TIN/SSN, and related payment information necessary for 1099 tax reporting purposes. • **Division of Administration (DOA) provides a consolidated log of all convenience checks** written in each FDIC division. DOF reviews the convenience check log to determine if the checks written are 1099 reportable. After a review is completed, an Excel file is created with all of the 1099 reportable transactions and the file is sent to OneSource. The information contained in this file includes, for example: Check Number, Transaction Date, Transaction Amount, Vendor Name, Location of Where the Transaction Took Place, Vendor Mailing Address, Vendor TIN, and Description of the Purchase. • **A file containing FDIC Employee Supplemental Payment information for W-2s and 1099s** is created by DOF in the **New Financial Environment (NFE) Supplemental Payment System (SPS)** module and HTTPS/SFTP'ed to a server where it is transferred to OneSource. This file contains information related to Corporate activities and includes, for example: Full Name, Address and SSN or TIN of employees/vendors who received supplemental payments from FDIC, along with the amount of the payments, wages and other financial information reported on Supplemental

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[2] DPS is a system used by FDIC Division of Resolutions and Receiverships (DRR) to generate several types of dividend payments to uninsured depositors and general trade creditors when assets from the failed bank become liquid, as well as to print payout checks to insured depositors during closings of FDIC-insured financial institutions.

	W-2s and 1099s, as specified in Q4. In addition, **FDIC Corporate Human Resources Information System (CHRIS) HR** passes PII to OneSource when FDIC employees log into FDIC's New Financial Environment (NFE) W-2 Self-Service application using their network ID (NT ID) credentials. Those credentials are used to authenticate the employee and to access and retrieve PII from the CHRIS HR database, including the employee's name and social security number (SSN). The PII retrieved from CHRIS HR is used as the Key Fields to verify and access the employee's supplemental W-2 form in Thomson Reuters' OneSource/eComply database.
5e. Collected from non-FDIC entities, system(s), or application(s).	The PII identified in Q4 is derived from the following external systems/sources and stored in the Thomson Reuters' OneSource database, as described below: • **DOF retrieves a file from US Bank's Purchase Cards (PCards) website** containing all year-end transactions meeting the Internal Revenue Service (IRS) aggregate total of $600. The information in this file is for year-end 1099 reporting related to Corporate activities and includes, for example: Vendor/Payee Name, Address, TIN, and information on the dollar amounts associated with each transaction. DOF manually uploads this file into OneSource via secure transmission. • **Failed Bank Files containing 1098/1099 information** for applicable bank customers and vendors are sent via encrypted email or SFTP to OneSource by DRR staff. Information contained in this file relates to Receivership activities and contains, for example: the Full Name, Address and TIN or SSN of the Bank Vendor/Customer, and Dollar Amounts for 1098/1099 reporting. (Note: Failed bank files may be received via cartridge or tape from the Receivership Bank in instances when the failed bank does not have the technology to send it via encrypted email or SFTP.)
5f. Collected from federal, state, or local government agencies	**Not applicable.** The PII identified in Q4 is collected from internal FDIC systems, US Banks' PCards, and Receivership Banks, as identified above in Q5d and Q5e. Federal, state or local agencies do not directly provide or upload PII data to OneSource.
5g. Other collection method or mechanism	**Not applicable.**

6. **What will be the intended use and purpose of the PII identified in question 4?** *(Provide a summary of how the PII will be used by the Provider in support of a specific FDIC business process.)*

> The PII identified in Q4 is used to provide 1098, 1099 and Supplemental Payment W-2 tax reporting information to the appropriate federal and state taxing authorities, as well as furnish required tax-reporting statements to the appropriate Corporate and Receivership recipients, as explained in Q4.

7. **Will system users *retrieve* data or records in the system by a personal identifier (e.g., name, address, SSN, EIN, or other unique identifier)?**

☐ Not Applicable ☐ No ☒ Yes *(If yes, explain how data is retrieved.)*

8. **Explanation:** Data can be retrieved by personal identifiers, such as Name and Social Security Number.

SECTION III – ACCESS AND SHARING

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

PII Will Be Used By and/or Shared With:	No	Yes	If Yes, Explain the Purpose and Use of PII
9a. FDIC Employees	☐	☒	Access to PII in OneSource is available to a limited number of authorized employees in the FDIC Division of Finance (DOF) Receivables, Receipts & Disbursement, and Vendor File Maintenance Group, and an equally small number of authorized FDIC personnel in Division of Resolutions & Receiverships (DRR). Specifically: • **The DOF Receivables, Receipts & Disbursement Group** has access to the Supplemental W-2 information for FDIC employees and contractors for purposes of uploading and reviewing information; answering recipients' questions about their respective W-2 forms; making necessary corrections to inaccurate data; and providing duplicate copies of forms to recipients upon request. • **The DOF Vendor File Maintenance Group** has access to OneSource to review and manage 1099 Corporate data, as well as to maintain appropriate vendor codes and information for federal tax reporting purposes. • **DRR employees** have read-only access to 1098/1099 data pertaining to customers and vendors of Receivership Banks for purposes of reviewing and verifying the accuracy of data, in the event of a discrepancy and as requested by DOF. Also, a limited number of employees in the Division of Information Technology (DIT) Security Section are able to access and view the user groups in OneSource for purposes of answering any questions regarding security access levels. However, DIT employees do not have access to PII in OneSource. In addition, FDIC employees who receive Supplemental W-2 payments will have the on-line capability to print and save a PDF copy of their respective supplemental W-2 forms thru the NFE W-2 Self-Service application. These employees will not have direct access to OneSource. Rather, they will log in to NFE using their NT ID credentials. The employees' NT credentials will be used to authenticate the employee and to retrieve the employee's name,

			SSN, and EIN from the CHRIS HR database. In turn, this PII will be securely transmitted to Thomson Reuters as the Key Fields to access and retrieve the employee's supplemental W-2 form in Thomson Reuters' OneSource/eComply database. Access to OneSource requires manager approval and is restricted to the authorized individuals identified above. Access privileges are granted based on a need-to-know basis and the actions that specific individuals are assigned to perform. FDIC users' access to OneSource is in compliance with the Corporate Access Control Policy.
9b. FDIC Contractors	☒	☐	Not applicable.
9c. Outsourced Information Service Provider Staff and/or the Information Service Provider's Subcontractors	☐	☒	Authorized employees at Thomson Reuters, the vendor for OneSource/eComply, have access to all data in the system for purposes of processing, printing, and mailing the tax forms to appropriate recipients, as well as electronically filing the tax reporting forms with the appropriate federal and state taxing authorities. Thomson Reuters employees' access to and use of the data are subject to the Confidentiality and Non-Disclosure Agreements they executed with FDIC.
9d. Other Non-FDIC Entities/Parties (e.g., failed financial institutions, assuming institutions, bidders/investors.)	☒	☐	Other non-FDIC entities/parties will not have direct access to PII data stored in OneSource.
9e. Federal, State, and/or Local Agencies	☐	☒	Data from OneSource is reported to appropriate federal and state taxing authorities for tax collecting/reporting purposes. However, federal, state, and local agencies do not have direct access to OneSource.
9f. FDIC Systems/ Applications	☐	☒	When an FDIC employee logs into NFE and authenticates themselves using their NT ID, the PII specified in Q4 will be located in the PeopleSoft CHRIS HR database and used to create the unique key to identify and retrieve the correct record from the Thomson Reuters Financial database (OneSource/eComply).
9g. Non-FDIC Systems/ Applications	☒	☐	Other non-FDIC systems/applications will not have direct access to PII data stored in OneSource.
9h. Other	☒	☐	Not applicable.

10. If data will be provided to or shared with 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	No	Yes
FDIC Confidentiality Agreement (Corporation)	☒	☐
FDIC Confidentiality Agreement (Individual)	☐	☒
Non-Disclosure Agreement (NDA)	☐	☒
Memoranda of Understanding (MOU)	☐	☒
Information Sharing Agreements (ISA)	☐	☒

Authentication Risk Assessment	☐	☒
Other Applicable Agreement(s) (*Specify*):	☒	☐
If you answered NO to any item above, please provide additional information if available. Thomson Reuters is an outsourced service provider.		

SECTION IV – NOTICE AND CONSENT

If you answered "YES" to question 5C in Section II, answer the following questions:

11. 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.):* PII maintained in OneSource/eComply is not collected directly from individuals; rather, it is collected from internal FDIC systems/sources, US Bank's Purchase Cards (PCards) website, and failed bank files in receivership. The PII is specifically required for providing recipients with their year-end tax forms, as well as for reporting transactions related to these tax forms to the appropriate federal (e.g. Internal Revenue Service or Social Security Administration) and state taxing authorities. Therefore, there is no opt-out option.

> ☐ 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.):*

12. 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

13. Please assert what administrative procedures and technical safeguards are in place to protect PII data in the Outsourced Information Service Provider's care. [Thomson Reuters (Tax & Accounting) - OneSource.]

☒ Thomson Reuters (Tax & Accounting) 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

☒ Other (Explain any other administrative and/or technical safeguards in place to protect PII data in the Outsourced Information Service Provider's care.) **Attach the <u>Contract Clause Verification Checklist</u> to the back of this form.**   To prevent the misuse of data by those having access, OneSource has a two-layer log-in, as well as a built-in audit trail which logs and timestamps any data manipulations (e.g., deletions, additions, etc.) made by users. In addition, Thomson Reuters has undergone various security audits by outside auditing firms to assess and verify that their IT security control objectives and processes for protecting customer data are adequate. In case of disasters, a full back-up site, which is a mirror of the main site, has been set up in a separate, secure location, and all of the same, aforementioned security measures have been implemented.

14. 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 internal FDIC systems/sources, US Banks' PCards, and Receivership Banks, as explained in Q5. As such, the FDIC and its vendor rely on these sources to provide accurate data.

☐ The vendor works with FDIC to verify the integrity of the data [before, in conjunction with, and/or after] inputting it into the system or using it to support the project.

☐ As necessary, an [authorized user or administrator] of the [System/Project Name] 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*.) All data maintained in OneSource/eComply is generated by internal FDIC systems/sources, except for data collected from applicable Receivership Bank files and US Bank's Purchase Cards website, as explained in Q5. Data from these external sources are obtained by DOF staff and checked for viruses before being entered into the system. All data contained in the system undergoes a three-tiered reconciliation process to ensure the reliability of the data. This process consists of three separate data validation checks, including an initial check when the data is received from the source, a second check/reconciliation before the data is sent to OneSource, and a third validation check which is performed prior to the printing and mailing of the appropriate tax forms. Also, control reports produced by the feeding applications are maintained and validated against the control reports produced when the data is processed by OneSource, in order to ensure data is accurate and complete.

15. 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, the DOF Program Manager/Data Owner, Technical Monitors, Oversight Manager, and Information Security Manager (ISM) for OneSource 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 Troy Taylor (troy.taylor@thomsonreuters.com) 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 vendor must comply with the Monitoring and Incident Response 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 – INFORMATION RETENTION AND DISPOSAL

16. Check off all applicable box(es) next to the statements regarding the retention and disposition of data by the Outsourced Information Service Provider.

☒ FDIC records retention requirements have been communicated to the Outsourced Information Service Provider.

☒ The retention period for data used as part of this outsourced service adheres to FDIC requirements for data retention and to those retention requirements noted in the contract.

☒ Data is retired and destroyed in accordance with National Archives and Records Administration (NARA) guidance and FDIC Records Retention and Disposition Schedules. **(NOTE: *Refer to Circular 1210.1, FDIC Records Management Program Manual, for details on how long categories of records may be maintained by the FDIC.)***

☒ If known, please specify the period of time that data is retained and the specific procedures used for disposing of the data.

The OneSource data is retained for a period of seven (7) years. The data retention period follows the Generally Accepted Accounting Principles (GAAP) rule of accounting data retention and complies with the guidance in the Records Retention and Disposition Schedule published by the FDIC Division of Administration.

At the end of the retention period, historical data that has expired is logically deleted from the database and the disk space is reclaimed for reuse by the application. Hardcopy reports containing PII are not produced or maintained.