Privacy Impact Assessment for Ginnie Mae Contractors

GinnieNET

Information Management Division

February 2, 2007

Version 1.1

Introduction

The purpose of this Privacy Impact Assessment is to help the Information Management Division (IMD) identify Ginnie Mae's information systems that process, store, use, and distribute data covered under the Privacy Act of 1974.

Ginnie Mae is responsible for ensuring the privacy and confidentiality of Personally Identifiable Information (PII) it collects, maintains, or disseminates from or about members of the public. Personally Identifiable Information includes information in an IT system or online collection: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors.)

Instructions:

1. **Fill out Part 1 of this study.**

   You may fill out the study electronically, but you must print it out to sign and mail it.

2. **If you check yes to any of the questions about PII data in Section c of Part 1, you must also fill out Part 2.**

   Please be as descriptive as possible in answering the questions. You may use additional paper if necessary.

3. **Sign and date the form, and then mail it to the following address via a secure mail service:**

   Ginnie Mae
   Attention: Chitranjan Khandpur
   451 7th Street SW
   Room # B-133
   Washington, DC 20410

If your organization processes, stores, uses, or distributes PII data, a security analyst working with the Ginnie Mae Information Management Division (IMD) will contact you to arrange a brief interview regarding how the PII data is being protected from unauthorized use, disclosure, or loss. These interviews usually last less than an hour, and you are not required to travel (the security team will come to your site).

Thank you for helping protect Ginnie Mae PII/privacy data.

Part 1: Privacy Data Determination

Please review Section "a" and fill out Sections b and c of Part 1.

a. System Information

If any information is incorrect in this section, please strike through it, correct it, and then initial the correction.

System Information	
System Name	GinnieNET
System Description	GinnieNET enables the Ginnie Mae to receive pool information from issuers and document custodians electronically, thus eliminating paper submissions.
Name of System Provider	Bank of New York
Address of System Provider	**Jumedia Buchner** 4 New York Plaza, 17th Floor New York, NY 10004
Ginnie Mae Information Owner	Thomas Weakland GTR, SVP Program Operations

b. System Provider Contact Information

Please enter the names and contact information for those personnel with primary responsibility for the Ginnie Mae information system.

Contact Name	Title	Phone	Email
Brian Lavelle	Vice-President	(212) 623-6050	brian.lavelle@bankofny.com
Marc Sandler	Vice-President	(212) 623-6509	marc.sandler@bankofny.com

c. PII Data Processed by System

What Personally Identifiable Information (PII) is collected or stored on your Ginnie Mae information system(s)? Please check yes or no in the box provided.

Type of PII Data		Yes	No
1.	Name	☒	☐
2.	Social Security Number (SSN)	☐	☒
3.	Home address	☒	☐
4.	Home telephone	☐	☒
5.	Personal email address	☐	☒
6.	Date of birth	☐	☒
7.	Driver's license/state ID number	☒	☐
8.	Race (e.g., Caucasian, African-American, American Indian, etc.)	☐	☒
9.	Religion	☐	☒
10.	Ethnicity/national origin (e.g., Canadian, South African, etc.)	☐	☒
11.	Biometric information (e.g., fingerprint, voiceprint, photograph, etc.)	☒	☐
12.	Financial information (loan number, credit score, credit card number, etc.)	☒	☐
13.	Passport number	☐	☒
14.	Permanent and Alien registration number (Green Card)	☐	☒
15.	Insurance policy number	☐	☒
16.	Digital/electronic signature information	☒	☐
17.	Medical/psychological information	☐	☒
18.	Criminal history	☐	☒
19.	Mother's maiden name	☐	☒
20.	Drug test results	☐	☒
21.	Marital status	☐	☒
23.	Education history	☐	☒
24.	Other (please specify):	☐	☒

Part 2: Privacy Data Details

If you answered yes to any question in Part 1, Section c of this form, please answer the questions below as completely as possible.

1. **What PII information does your Ginnie Mae system process, store, or collect?**

   Personally identifiable information (PII) includes information in an IT system or online collection: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors.)

   Mortgagee name, address

2. **Does your Ginnie Mae system process, store, or collect PII data about more than 10 individuals?**

   ☒ Yes ☐ No

3. **On what type of media is the PII data stored or collected? (For example, is the information collected via the Web, email, CDs, paper forms, etc.?)**

   Stored on a SANS device on a isolated secure network and is collected via the web or a desktop application..

4. **Where is the server, media, or storage mechanism on which the PII data is stored?**

   Servers are located at 4 New York Plaza, New York, NY, mainframe in Wilmington DE

5. **What are the sources of the PII data?**

   Ginnie Mae issuers

6. **Why is the PII data stored or collected?**

   Used for identification

7. **What is the current / intended use of the PII data?**

   Used for identification

8. **With whom is the PII data shared (other agencies, organizations, systems, etc.)?**

Ginnie Mae's Data Collection contractor

9. **How is the PII data secured?**

The data is stored on the mainframe in a segrated LPar, to which access is restricted to BNY employees whose job descriptions require access to that data and to employees of Ginnie Mae. In the distributed environmnet, the data is stored on SAN unit on an isolated network. Access to the data on the SAN unit to which access is restricted to BNY employees whose job descriptions require access to that data. All data is stored in secured facilities and card key access is required, at a minimum.

10. **Is this IT system a System of Record?**

A System of Record is any group of records under the control of an agency from which information is retrieved by the name of an individual or by some identifying number, symbol, or other identifying particular assigned to the individual. For example, a system that collects credit scores of individuals and is searchable by name or SSN would be a System of Record.

☐ Yes ☒ No

Additional explanation if required:

11. **Is this system part of another System of Record?**

If your system receives a feed containing PII data from another agency's system that collects the PII data from the public, then that other agency's system is the System of Record and they are the sponsor of the collection. For example, if your system uses data from FHA that the agency has collected directly from the public, then your system is not the System of Record (the FHA system is).

☐ Yes ☒ No

If yes, provide name of the System of Record and sponsor:

12. **Has a Systems of Record Notice (SORN) been published/approved by OMB for the system?**

A SORN is a notice that is published in the Federal Register whenever a new System of Record is implemented or an existing System of Record has modifications that impact the privacy data it collects.

☐ Yes ☒ No

If yes, provide OMB form number and name:

13. **Is the system currently being modified or will it be modified this year?**

If yes, describe modification.

☒ Yes ☐ No

If yes, describe modification:

All GinnieNET functionality is beiong moved to the web; LIBOR ARMs is being added to

GinnieNET as a new type of pool.

14. If the system is being modified, will the SORN require amendment or revision?

A revised notice must be published in the Federal register if the planned modifications to the System of Record will impact the privacy data the system collects.

☐ Yes ☒ No

If yes, explain:

Based on the authority of contractor representative, all data captured in this document is current and accurate.

Signature — Date: 1/25/2007

Brian Lavelle — VP - Technology

Printed Name — Title

Reviewed by:

Chitranjan Khandpur — Date: 2/16/07

Ginnie Mae Chief Privacy Officer

Reviewed by:

Deborah V. Holmes — Date: 2/16/07

Ginnie Mae Chief Information Officer