

Alcohol and Tobacco Tax and Trade Bureau

Technical Services System (TSS)

Privacy Impact Assessment

Information Collected and Purpose

TSS, which is currently a read-only system, used to be the primary tool by which TTB processed and stored information relative to the identify of entities who applied for a permit to manufacture, process, import, use, or sell alcohol and tobacco products. It also maintains information on applicants and entities who have been issued a permit or denied a permit. At present, this system is used for historical data reference purposes only, and its functionality has been incorporated into IRIS. TSS only stores Personally Identifiable Information (PII) that has been included in submitted applications and permits by individuals.

TSS stores contact information which includes their names, phone numbers, and email addresses. TSS also stored the social security numbers of individuals who have provided that information in order for the bureau to perform a background check.

For individuals with direct access to TSS, TTB also collects necessary PII to authenticate users and restrict permissions. TSS associates these individuals with user-created user IDs and passwords.

Information Use and Sharing

TSS stores PII in order to accurately match individuals and their entities with submitted applications and permits. TSS collects contact information in case there is something wrong or missing with an application, permit or return. Social security numbers are stored as a part of applications and are required for background checks. Designated and approved TTB employees have direct access to TSS data, but are required to authenticate before being granted access to the system. All individuals receive different rights in TSS according to their job roles and needs.

Information Consent

For an individual's PII to be in TSS, he or she must have willingly and intentionally filled out and submitted an application, or permit which was transmitted to TSS.

Information Protection

TTB will take appropriate security measures to safeguard PII and other sensitive data stored in TSS. TTB will apply Department of the Treasury security standards, including but not limited to routine scans and monitoring, back-up activities, and background security checks of all TTB employees and contractors.

In addition, access to TSS PII will be limited according to job function. TTB will control access privileges according to least privilege, which restricts access to information based on their needs.

The following access safeguards will also be implemented:

- Passwords expire after a set period
- Accounts are locked after a set period of inactivity
- Minimum length of passwords is eight characters
- Passwords must be a combination of letters and numbers and symbols
- Accounts are locked after a set number of incorrect attempts