

# **Alcohol and Tobacco Tax and Trade Bureau**

## **Auto Audit**

### **Privacy Impact Assessment**

#### **Information Collected and Purpose**

The Auto Audit system is the primary tool by which the Alcohol and Tobacco Tax and Trade Bureau documents procedures, results, time scheduling, and industry member information related to the investigations and audits conducted by TTB field offices. Auto Audit only stores Personally Identifiable Information (PII) in the form of contact information that is required for investigations and audits. For individuals with direct access to Auto Audit, TTB also collects necessary PII to authenticate users and restrict permissions. Auto Audit associates these individuals with user-created user IDs and passwords.

#### **Information Use and Sharing**

Auto Audit stores names, email addresses, and phone numbers of those individuals who have provided that information for an audit or investigation. Designated and approved TTB employees and Federal compliance officials have direct access to Auto Audit, and are required to provide the correct credentials in order to gain access to the system. All individuals receive different rights in Auto Audit according to their job roles and needs.

In some cases, TTB may need to share some information in Auto Audit within other departments of TTB, or perhaps with other government agencies, however TTB does not share PII from Auto Audit outside of the federal government. TTB will also provide the minimum information necessary in these data transfers and regulate user access according to job function and business need. TTB evaluates each request on an individual basis and oversees the process to ensure all procedures are followed pursuant to the Privacy Act of 1974.

#### **Information Consent**

For an individual's PII to be in Auto Audit, he or she must have willingly provided their contact information for an investigation.

#### **Information Protection**

TTB will take appropriate security measures to safeguard PII and other sensitive data stored in Auto Audit. 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 Auto Audit PII will be limited according to job function. TTB will control access privileges according to least privilege.

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