

Alcohol and Tobacco Tax and Trade Bureau

Certificate of Label Approval Online (COLAs Online)

Privacy Impact Assessment

Information Collected and Purpose

COLAs Online is a web-based application that facilitates and improves the submission and review process for alcohol beverage labels (TTB Form 5100.31, OMB Number 1513-0020) by providing an expedient and paperless means of obtaining Federal label approval. A certificate of label approval authorizes the certificate holder to bottle and remove or import alcohol beverages that bear labels identical to those shown on the certificate of label approval. COLAs Online provides a web-based interface that facilitates the process for industry members to submit electronic applications for COLAs, and interfaces with other strategic systems including IRIS for permit, registry, and other authorized data. COLAs Online only stores Personally Identifiable Information (PII) that has been included in submitted label approval applications by individuals. For individuals with direct access to COLAs Online, TTB also collects necessary PII to authenticate users and restrict permissions. COLAs Online associates these individuals with user-created user IDs and passwords.

Information Use and Sharing

COLAs Online stores names and phone numbers of those individuals who have provided that information on COLA applications. COLAs Online does not have a public website for anybody to check the status of an application, however only designated and approved TTB employees have direct access to PII stored in COLAs. All individuals receive different rights in COLAs Online according to their job roles and needs.

Information Consent

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

Information Protection

TTB will take appropriate security measures to safeguard PII and other sensitive data stored in COLAs Online. 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 COLAs Online 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