Alcohol and Tobacco Tax and Trade Bureau

Integrated Revenue Information System (IRIS) Privacy Impact Assessment

Information Collected and Purpose

The Integrated Revenue Information System (IRIS) ensures fair and proper collection of revenue from the industry members for alcohol, tobacco, firearms, and ammunition excise taxes. IRIS is the primary tool by which the Alcohol, Tobacco, Tax and Trade Bureau (TTB) records and tracks applications, permits and industry production. IRIS only stores Personally Identifiable Information (PII) that has been included in submitted applications and permits by individuals.

IRIS stores contact information which includes their names, addresses, phone numbers, and email addresses. Some permits submitted to IRIS may also store PII in the form of an individual's gender, citizenship and social security number.

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

Information Use and Sharing

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

Information Consent

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

Information Protection

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