Alcohol and Tobacco Tax and Trade Bureau

Sunflower System

Privacy Impact Assessment

Information Collected and Purpose

The Sunflower System (SS) is the Bureau's automated property management system. It uses an Oracle database and is accessible thru the Bureau network. It is used to account for all types of property purchased with public funds and tracks those assets through life cycles management (acquisition, utilization, and disposal). It also tracks leased property; property transfers. SS retrieves report data used to support investigations, inspections, and financial statement reconciliation including depreciation of Capitalized Assets. Property managers extract statistical data in response to GAO, Department of Treasury and other external inquiries. It supports barcode scanning technology equipment in performing inventories.

SS stores Personally Identifiable Information (PII) in the form of contact information that has been provided during equipment inventories. For individuals with direct access to SS, TTB also collects necessary PII to authenticate users and restrict permissions. SS associates these individuals with user-created user IDs and passwords.

Information Use and Sharing

As an automated property management system, SS stores names, phone numbers and email addresses of users who have provided that information to TTB and who have taken control of TTB property. Designated and approved TTB employees have direct access to SS. All individuals receive different rights in SS according to their job roles and needs, and are required to authenticate before gaining access to SS.

Information Consent

For an individual's PII to be in SS, he or she must have consented to provide their contact information as a condition for using TTB property.

Information Protection

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