

Date of Approval: 09/08/2025  
Questionnaire Number: 2554

## Basic Information/Executive Summary

What is the name of your project (system, database, pilot, product, survey, social media site, etc.)?

DecryptNaBox aka Data Decrypt Professional application

Acronym:

DNB

Business Unit

Information Technology

Preparer

# For Official Use Only

Subject Matter Expert

# For Official Use Only

Program Manager

# For Official Use Only

Designated Executive Representative

# For Official Use Only

Executive Sponsor

# For Official Use Only

Executive Summary: Provide a clear and concise description of your project and how it will allow the IRS to achieve its mission.

DNB DecryptNaBox Professional also known as Data Decrypt Client or Data Decrypt Professional is dedicated software used by IT eDiscovery Program Office to perform decrypting target collected data sets to provide to Chief Counsel. We need this software to provide thousands of attorneys' data allowing them to prepare for trials. Not being able to access this data due to encryption in a timely manner would make it impossible to meet statutorily and judicially imposed deadlines, putting tens of billions in revenue at risk. The application itself does not collect or transfer any information. But we in ITEDISCOVERY area are responsible to collect/ to process/ to present the result data set to Chief Counsel according to Litigation Hold Requirement. We do not share any of this electronic stored information (ESI) to any other party except Chief Counsel to be in compliance with legal request. This application itself only serves as decrypting

tool to our collected email data set, and it does not collect emails or process any other documents that we collect according to Litigation Hold scope and parameter. The ESI is securely protected in ITEDISCOVERY processing scope. ESI repository Servers are protected by RBAC Role Based Access Control to access data on these servers. These data are not shared or being used for any other purposes except Litigation Hold process/ FOIA/ Or TIGTA requests.

## **Personally Identifiable Information (PII)**

Will this project use, collect, receive, display, store, maintain, or disseminate any type of Sensitive but Unclassified (SBU), Personally Identifiable Information (PII), or Federal Tax Information (FTI)?

Yes

Please explain in detail how this project uses sensitive data from inception to destruction (data lifecycle).

Encryption of email messages is a common component of enterprise security and privacy. However, encrypted data is typically a challenge for electronic discovery procedures and is often excluded from review. DataDecrypt Professional or DecryptNaBox provides the means to decrypt, and encrypt, massive amounts of Exchange data quickly and easily. The application itself does not collect or process data. It only does decrypt function. We cannot dispose any data until we receive Litigation Hold Release from Counsel from which Chief Counsel authorization for us to remove data. However, original data remain with users which would follow our Enterprise schedule of disposition because what we collected and processed are the copy of the original data set which would remain intact and no change.

Please select all types of Sensitive but Unclassified data (SBU)/Personally Identifiable Information (PII)/Federal Tax Information (FTI) that this project uses.

Address

Email Address

Employer Identification Number

Employment Information

Name

Protected Information

Standard Employee Identifier (SEID)

Tax ID Number

Cite the authority for collecting SBU/PII/FTI (including SSN if relevant).

PII for personnel administration - 5 USC

# Product Information (Questions)

1 Is this PCLIA a result of a specific initiative or a process improvement?

No

2 What type of project is this (system, project, application, database, pilot/proof of concept/prototype, power platform/visualization tool)?

Application

3 What Tier designation has been applied to your system? (Number)

2

4 Is this a new system?

No

4.1 Is there a previous Privacy and Civil Liberties Impact Assessment (PCLIA) for this project?

Yes

4.11 What is the previous PCLIA number?

7371

4.12 What is the previous PCLIA title (system name)?

DecryptNaBox Professional Solution (aka DNB) application not system

4.2 You have indicated this is not a new system; explain what has or will change and why. (Expiring PCLIA, changes to the PII or use of the PII, etc.)

DecryptNaBox Professional, DNB or Data Decrypt Professional. Expiring PIA ID 7371

5 Is this system considered a child system/application to another (parent) system?

No

6 Indicate what OneSDLC State is the system in (Allocation, Readiness, Execution) or indicate if you go through Information Technology's (IT) Technical Insertion Process and what stage you have progressed to.

Execution. No, we did not go through Technical Insertion Process because this is existing software to be upgraded to.

7 Is this a change resulting from the OneSDLC process?

No

9 If the system is on the As-Built-Architecture (ABA), what is the ABA ID number of the system? If this PCLIA covers multiple applications shown on the ABA, please indicate the ABA ID number(s) for each application covered separated by a comma. If the system is not in the ABA, then contact the ABA (<https://ea.web.irs.gov/aba/index.html>) for assistance.

Not applicable because this is not system PIA, but it is small application just one function decrypting in our process. But it does have EA ESP ID itself as EA ESP #10223.

10 If this system discloses any PII to any third party outside the IRS, does the system have a process in place to account for such disclosures in compliance with IRC 6103(p)(3)(A) or Subsection c of the Privacy Act?

Yes

11 Does your project/system involve any use of artificial intelligence (AI), including virtual assistant, chat bot, and robotic process automation, as defined in Executive Order 13960 and 14110?

No

12 Does this system use cloud computing?

No

13 Does this system/application interact with the public?

No

14 Describe the business process allowing an individual to access or correct their information. (Due Process)

Not Applicable - None because this application function is just decrypting email messages that are encrypted. It is part of our process, but it is not the process itself. We are obligated to provide response result to Chief Counsel Litigation Hold Request process and to decrypt them if needed.

15 Is this system owned and/or operated by a contractor?

No

16 Identify what role(s) the IRS and/or the contractor(s) performs; indicate what access level (to this system's PII data) each role is entitled to. (Include details about completion status and level of access of the contractor's background investigation was approved for.)

Contractors or IRS IT Specialists completed periodic background investigation (NIBS) that we have just recently completed recently like last year. Contractors in our area on the other hands, would have to go through MBI as required both would be for Moderate Risks. User/ Contractor: Modified Access.

17 The Privacy Act of 1974 (5 USC § 552a(e)(3)) requires each agency that maintains a system of records, to inform each individual requested to supply information about himself or herself. Please provide the Privacy Act Statement presented by your system or indicate a Privacy Act Statement is not used and individuals are not given the opportunity to consent to the collection of their PII.

The Consent to collect PII is present to users in my areas called custodians through daily Logon banner on the systems each time users consent to logon. In Litigation Hold process, Attorneys also inform custodians in advance before the collection process starts. However, this application has nothing to do with the collection process because it does not have functionality or capability to collect. It only decrypting any emails messages that need to be decrypted.

18 How many records in the system are attributable to IRS Employees? Enter "Under 50,000", "50,000 to 100,000", "More than 100,000" or "Not Applicable".

50,000 to 100,000

19 How many records in the system are attributable to contractors? Enter "Under 5,000", "5,000 to 10,000", "More than 10,000" or "Not Applicable".

Not Applicable

20 How many records in the system are attributable to members of the public? Enter "Under 100,000", "100,000 to 1,000,000", "More than 1,000,000" or "Not applicable".

Not applicable

22 How is access to SBU/PII determined and by whom?

Members in ITEDISCOVERY Case Examiners (8-10 IT Specialists) positions would need to request few BEARs entitlements. The entitlements would have to go through Lead Infrastructure, and Manager (First/ Second Level of Approvers) to determine the access should be approved or denied if necessary. After that those entitlements would go to System Admin/ Exchange Admin and or M 365 Admin who would authorize to grant the request entitlements. You would need to be several different roles in eDiscovery Examiner such as Purview eDiscovery Examiner; Azure Admin Role, Exchange PowerShell cmdlet, Encase User; Exchange Admins etc. to access in performing the process of examining the cases with necessary access to complete results for Litigation Hold Requests.

23 Is there a data dictionary on file for this system? Note: Selecting "Yes" indicates an upload to the Attachment Section is required.

No

25 Please upload all privacy risk finding documents identified for the system (Audit trail, RAFT, POA&M, Breach Plan, etc.); click "yes" to confirm upload(s) are complete.

No

26 Describe this system's audit trail in detail. Provide supporting documents.  
The software would produce the error logs to indicate how many item records that were successfully decrypted.

27 Does this system use or plan to use SBU data in a non-production environment?  
No

## Interfaces

### Interface Type

IRS Systems, file, or database

### Agency Name

SHREDR repository known as Data Center on-Prem servers

### Incoming/Outgoing

Incoming (Receiving)

### Transfer Method

Application to Application (A2A)

## Systems of Records Notices (SORNs)

### SORN Number & Name

IRS 48.001 - Disclosure Records

Describe the IRS use and relevance of this SORN.

We are obligated to provide data as request from Chief Counsel for  
Litigation Hold Process

### SORN Number & Name

IRS 34.037 - Audit Trail and Security Records

Describe the IRS use and relevance of this SORN.

These data sets or records are provided to be in compliant with  
Litigation Hold Process

### SORN Number & Name

IRS 36.003 - General Personnel and Payroll Records

Describe the IRS use and relevance of this SORN.

We need to use these records to fulfill legal obligation in  
compliance with Chief Counsel Litigation Hold Request

# Records Retention

What is the Record Schedule System?

General Record Schedule (GRS)

What is the retention series title?

Infrastructure Project of Record

What is the GRS/RCS Item Number?

GRS 3.1 Item 010

What type of Records is this for?

Electronic

Please provide a brief description of the chosen GRS or RCS item.

GRS 3.1 Item 010-Infrastructure project records-Destroy 5 years after project is terminated, but longer retention is authorized if required for business use. We selected this schedule because this was listed as the schedule the previous one (expiring followed)

What is the disposition schedule?

We will work with Records and Information Management (RIM) Program Office to address records disposition schedule as needed. In addition, according to our current process, we can't dispose any record until Chief Counsel provide Litigation Hold Release.

What is the Record Schedule System?

General Record Schedule (GRS)

What is the retention series title?

Documentation necessary for preservation of permanent electronic records- Permanent

What is the GRS/RCS Item Number?

GRS 3.1 Item 050

What type of Records is this for?

Electronic

Please provide a brief description of the chosen GRS or RCS item.

This was also shown in the expiring PIA that we are renewing as one of the schedules that previous PIA recorded

What is the disposition schedule?

We don't dispose any record in related to Litigation Hold Request or data set we processed. We only can dispose the processed data after we receive the Litigation Hold Release although the listed schedule may have disposition time frame.

What is the Record Schedule System?

General Record Schedule (GRS)

What is the retention series title?

PKI administrative records

What is the GRS/RCS Item Number?

GRS 3.2 Item 060

What type of Records is this for?

Electronic

Please provide a brief description of the chosen GRS or RCS item.

This schedule was also shown in the expiring PIA that we are renewing as one of the schedules that previous PIA recorded.

What is the disposition schedule?

We don't dispose any record in related to Litigation Hold Request or data set we processed. We only can dispose the processed data after we receive the Litigation Hold Release from Chief Counsel although the listed schedule may have disposition time frame.

What is the Record Schedule System?

General Record Schedule (GRS)

What is the retention series title?

System development records

What is the GRS/RCS Item Number?

GRS 3.1 Item 011

What type of Records is this for?

Electronic

Please provide a brief description of the chosen GRS or RCS item.

This schedule was also included in previous PIA listed in this PIA that we are renewing

What is the disposition schedule?

We don't dispose any record in related to Litigation Hold Request or data set we processed. We only can dispose the processed data after we receive the Litigation Hold Release although the listed schedule may have disposition time frame.

What is the Record Schedule System?

General Record Schedule (GRS)

What is the retention series title?

All documentation for temporary electronic records and documentation

What is the GRS/RCS Item Number?

GRS 3.1 Item 051

What type of Records is this for?

Electronic

Please provide a brief description of the chosen GRS or RCS item.

This schedule was also shown in the expiring PIA that we are renewing as one of the schedules that previous PIA recorded.

What is the disposition schedule?

We don't dispose any record in related to Litigation Hold Request or data set we processed. We only can dispose the processed data

after we receive the Litigation Hold Release from Chief Counsel although the listed schedule may have disposition time frame.

What is the Record Schedule System?

General Record Schedule (GRS)

What is the retention series title?

PKI administrative records/other (non FBCA et.al.) CAs

What is the GRS/RCS Item Number?

GRS 3.2 Item 061

What type of Records is this for?

Electronic

Please provide a brief description of the chosen GRS or RCS item.

This schedule was also shown in the expiring PIA that we are renewing as one of the schedules that previous PIA recorded.

What is the disposition schedule?

We don't dispose any record in related to Litigation Hold Request or data set we processed. We only can dispose the processed data after we receive the Litigation Hold Release from Chief Counsel although the listed schedule may have disposition time frame.

## Data Locations

What type of site is this?

System

What is the name of the System?

Guardium

Please provide a brief description of the System.

The system will scan and report vulnerabilities and risks on our data repository to SMR Security Monitor & Remediation team.

What are the incoming connections to this System?

There are no incoming connections to this system.

What are the outgoing connections from this System?

These reports will be sent periodically to SMR Security Monitoring Remediation team and Project POC for further actions.

What type of site is this?

System

What is the name of the System?

Splunk

Please provide a brief description of the System.

The system will scan and report vulnerabilities and risks on our data repository.

What are the incoming connections to this System?

there are no incoming connections to this system

What are the outgoing connections from this System?

These reports will be sent periodically to SMR Security Monitoring Remediation team and Project POC for further actions.

What type of site is this?

System

What is the name of the System?

Qualys

Please provide a brief description of the System.

The system will scan and report vulnerabilities and risks on our data repository to SMR Security Monitor & Remediation team.

What are the incoming connections to this System?

There are no incoming connections to this system.

What are the outgoing connections from this System?

These reports will be sent periodically to SMR Security Monitoring Remediation team and Project POC for further actions.

What type of site is this?

Shared Drive

What is the name of the Shared Drive?

25 Secure Data Center known as SHREDR

What is the sensitivity of the Shared Drive?

Sensitive But Unclassified (SBU)

Please provide a brief description of the Shared Drive.

Our Share Drives are on prem. We have 25 of servers hosting those shares and it is secure servers not available for others, available only to those have the need to know and to work on Litigation Hold Process. We have 2 separate group of repository servers. One is for collect data and one is responsive result data set after we process. This is where Chief Counsel Tech or case designated attorneys would have access to view the result post processing. They all must go through BEARs request for access to specific cases not all.

What are the incoming connections to this Shared Drive?

Incoming connections are connected only to those involved in Litigation Hold process that they are working on the cases that need to upload requested collected data or to pull data for processing. Even Chief of Counsel technical group or attorney would only have access to the result server groups, not stored and preservation data server group. Also, the incoming connections to these data locations are our Enterprise security tools such as Splunk, Qualys and Guardium.

What are the outgoing connections from this Shared Drive?

Outgoing connection only from ITEDISCOVERY Examiners first would pull data from reserved and preservation data server group to processing

virtual systems to process them. Or Chief Counsel technical/ attorney group would review and pull responsive result data set from Result servers to their reviewing/ processing solution in Chief Counsel environment.