

Tennessee Valley Authority Privacy Impact Assessment (PIA)

SAP S4/Hana

This PIA is a tool used by the TVA Privacy Office to identify privacy risks at the planning/initiation phase of the system development lifecycle (SDLC) or early stages of project/program development. The PIA should be reviewed and updated if the system undergoes a major change. Questions regarding this document should be directed to privacy@tva.gov.

PIA should be submitted to:

TVA Privacy Office

privacy@tva.gov

Version 3.0

September 2018

PROGRAM MANAGEMENT

Author Name

Date of Submission

[Redacted]

07/15/2025

Responsible TVA Business Unit

Name of System

Financial Systems

SAP S4/Hana

System Owner Details

Reason for Completing PIA

Name [Redacted]
Title [Redacted]
Phone [Redacted]
Email [Redacted]

- New system
- Significant modification to an existing system
- To update existing PIA for a security authorization

PRIVACY DETERMINATION
(To be completed by the TVA Privacy Program)

Privacy Office Comments

[Redacted]

The signatures below certify that the information in this document has been reviewed and approved:

	Name	Signature	Date
System Owner	[Redacted]	[Redacted]	[Redacted]
Senior Privacy Program Manager	Chris Marsalis	Chris Marsalis (E-Signature)	07/22/2025

SYSTEM OVERVIEW

1. Please describe the purpose of the system/collection:

SAP S/4HANA is an ERP business suite based on the SAP HANA in-memory database that allows companies to perform transactions and analyze business data in real time.

2. About whom does the system collect, maintain, use and/or disseminate information? Check all that apply:

- TVA employees
 TVA contractor
 Members of the public

3. Is the information collected directly from the individual?

- Yes
 No
 How is the information collected? Information is pulled from HR.

4. What type of personally identifiable information (PII) can be/is collected, maintained, used, and/or disseminated? Check all that apply: (Per the Office of Management and Budget (OMB) Circular A-130, *Managing Information as a Strategic Resource*, personally identifiable information (PII) means information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual.)

- | | | |
|---|--|---|
| <input type="checkbox"/> Home Phone | <input checked="" type="checkbox"/> Financial Information | <input type="checkbox"/> Biometric Information |
| <input type="checkbox"/> Home Address | <input type="checkbox"/> Clearance Information | <input type="checkbox"/> Citizenship |
| <input type="checkbox"/> Home Email | <input type="checkbox"/> Mother's Maiden Name | <input type="checkbox"/> Driver's License Number |
| <input type="checkbox"/> Employment Information | <input type="checkbox"/> Date of Birth | <input type="checkbox"/> Username/Password |
| <input type="checkbox"/> Work Address | <input type="checkbox"/> Place of Birth | <input type="checkbox"/> Passport Number |
| <input type="checkbox"/> Work Phone | <input type="checkbox"/> Criminal History | <input type="checkbox"/> Other: |
| <input checked="" type="checkbox"/> Work Email | <input checked="" type="checkbox"/> Social Security number (SSN) | |
| <input checked="" type="checkbox"/> Name | <input type="checkbox"/> Medical or Health Information | |

If none of the above data elements are checked, stop and submit this PTA as-is to TVA Privacy Office at privacy@tva.gov. Otherwise, please continue completing the remaining questions in the document.

Number of people impacted?

- 1 - 999
 1,000 - 4,999
 5,000 - 19,999
 20,000 - 99,999
 100,000 or more

Privacy Notice and Transparency

5. Legal authority to collect, use, maintain, and share data in the system:

Tennessee Valley Authority Act of 1933, 16 U.S.C. 831-831ee; Executive Order 10577; Executive Order 10450; Executive Order 11478; Executive Order 11222; Equal Employment Opportunity Act of 1972, Public Law 92-261, 86 Stat. 103; Veterans' Preference Act of 1944, 58 Stat. 387, as amended; various sections of title 5 of the United States Code related to employment by TVA.

6. Does the system have a SORN? (If PII in the system is retrieved using one or more of the identifiers listed in Question 4, a System of Records Notice (SORN) is required.)

- Yes
 No

List name(s) of applicable SORN(s): TVA-2- Personnel Files

7. How are individuals notified as to how their information will be collected, maintained, used, and/or disseminated within this system?

PIA's, SORN's, Privacy Act Statement.

8. What consent options do individuals have regarding specific uses or sharing of their information?

None.

DATA MINIMIZATION

9. Are only the minimum PII elements that are relevant and necessary to accomplish the legally authorized purpose collected, used and retained?

- Yes
- No

10. What are the retention periods for the information in the system?

7 years

DATA QUALITY

11. How is data quality (i.e., accuracy, relevance, timeliness, and completeness) ensured throughout the data lifecycle and business processes associated with the use of the information? Check all that apply.

- Information is collected directly from individuals (preferred method of collection, whenever possible)
- If collected via a form, please list form(s) name and number here:

- Cross referencing information enties with other systems
- Third party information verification
- Character limits on text submissions
- Numerical restrictions in text boxes

Other:

12. How is inaccurate or outdated information checked for and corrected?

The information would be corrected within HR before transferring to S/4HANA.

Access and Redress

13. How can an individual access their information and have it corrected, amended, or deleted?

The individual would contact an HR representative to make any corrections.

Internal and External Sharing

14. Explain how the information in the system is limited to the uses specified in the notices discussed above.

This information is limited to the system owner and the admins.

15. With which (if any) internal TVA systems is the information shared?

Maximo, HR, C55, PowerPlan, eWorkplace.

16. With which (if any) organizations external to TVA is information shared?

Sovos Taxport

17. Does the system have any associated websites/applications including an external TVA website or third-party owned or managed website or application (e.g., Facebook, YouTube, Twitter, Flickr, etc.)?

Yes No

SECURITY

18. What privacy orientation or training is provided to authorized users of the system or individuals with access to the system?

[Redacted]

19. Has a FIPS 199 determination been made?

[Redacted]

20. What is the FIPS 199 determination? Check one for each.

[Redacted]

21. What types of technical safeguards are in place to protect the information?

[Redacted]

22. What types of physical safeguards exist to protect the information?

[Redacted]

23. What types of administrative safeguards exist to protect the information?



24. What monitoring, recording, and auditing safeguards are in place to prevent or detect unauthorized access or inappropriate usage?

All monitoring, recording, and auditing safeguards are in place by TVA Cybersecurity.

25. Discuss any other potential privacy risks to the information within the system and safeguards that are in place to mitigate those risks.

None.

Please submit completed form to: TVA Privacy Office
privacy@tva.gov