



Privacy Impact Assessment (PIA)

EVE LEGAL

(Name of the Information System or Information Collection)

February 2026

Date

System/Collection Overview

Eve Legal is a vendor-provided, cloud-based system used by outside counsel representing the Federal Housing Finance Agency (FHFA) in employment law matters. Eve Legal is a specialized platform that utilizes artificial intelligence to support document review, assist with legal analysis, and provide drafting assistance. Documents and information related to matters in litigation are uploaded to the platform where they are maintained until final resolution of the matter.

Section 1.0 Characterization of the Information

The following questions address the scope of the personally identifiable information (PII) requested and/or collected. PII is 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. PII includes, but is not limited to, name, address, Social Security number, date of birth, financial information, and demographic information.

#	Question and Response
1.1	<p><i>What and whose PII is being collected, used, disseminated, or maintained?</i></p> <p>Due to the nature of employment litigation, a wide variety of PII may be uploaded into Eve Legal if the information is contained in documents relevant to a case in litigation. PII may include, but not be limited to, personal and business contact information (address, phone number, email address), Social Security number, driver's license number, passport number, biometric identifiers (e.g., fingerprints, photographs), demographic information (e.g., sex, race, religion), medical information (e.g., information related to a reasonable accommodation request), education records, financial information (including salary and benefits information), military records, and bankruptcy or criminal records. Individuals covered include current and former government employees, interns, detailees, and applicants as well as contractor employees in limited circumstances.</p>
1.2	<p><i>If Social Security Numbers (SSNs) are included, describe in detail:</i></p> <ol style="list-style-type: none"><i>1) The business justification for collecting or using SSNs;</i><i>2) The consequences if SSNs are not collected or used;</i><i>3) How the SSNs will be protected while in use, in transit and in storage.</i>

	<p>Generally, SSNs will be redacted before documents are uploaded to the system. However, given the volume of documents uploaded, it is possible that unredacted SSNs may be uploaded into the system if they are not identified as part of the manual review process. SSNs are not otherwise entered into the system and records are not searched by SSN. SSNs are protected as described in Section 6.</p>
1.3	<p><i>How is the PII obtained? If individuals are not providing their own PII directly, describe where the information originates and any intermediaries it goes through before being provided to FHFA. Include a description of the mechanism by which the PII is provided to/obtained by FHFA.</i></p> <p>Information is obtained from existing documents, which typically include, but are not limited to, personnel records, witness statements, depositions, medical records, and Agency forms. Information in these documents is generally provided by individual employees when completing forms or filing complaints but may come from other sources including government records or medical providers.</p>
1.4	<p><i>How will the PII be used and for what purpose?</i></p> <p>Information uploaded to the system is used to assist outside counsel and their staff when representing FHFA in employment law matters. The system supports document review, legal analysis, and drafting documents. PII contained in the uploaded documents is not used by the system for a specific purpose, but rather is included as a part of the larger factual record.</p>
1.5	<p><i>Is there a risk that PII other than that described above will be collected? If no, explain why not. If yes, explain the risk and how the risk is mitigated.</i></p> <p>No. PII is obtained from existing documentation that has been identified as relevant to a matter in litigation.</p>
1.6	<p><i>Is there a risk that the PII collected will be inaccurate? If no, explain why not. If yes, explain the risk and how the risk is mitigated.</i></p>

	Existing documents are uploaded into the system so there is no risk that the use of this system will introduce inaccuracies in information previously collected. Further, the risk of inaccurate PII being uploaded to the system is generally low as the information is obtained from verified sources such as personnel records.
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Section 2.0 General

The following questions address general information about the information in the system, including how the information will be used and for what purpose.

#	Question and Response
2.1	<i>What is the legal authority for the collection?</i>
	5 U.S.C. Chapter 77; 5 CFR §§ 1201.71 – 1201.75; 42 U.S.C. § 2000e-16; 29 CFR § 1614.109(d).
2.2	<i>Is the collection of information subject to the Paperwork Reduction Act? If yes, what is the OMB Control Number for the collection?</i>
	No, the system is not used to collect information in a manner subject to the Paperwork Reduction Act.
2.3	<i>Is this a new PIA or an update to an existing PIA?</i>
	New PIA.
2.4	<i>Is the system internally operated or operated by a third-party (e.g., contractor)? If not internally operated, please identify the third party.</i>
	The system is operated by a third-party contractor, Eve Legal.

	<p><i>How is the risk of improper use of the PII by FHFA employees/contractors mitigated? If PII is shared with third parties, how will the risk of improper use by those parties be mitigated?</i></p>
2.5	<p>Access to information related to FHFA cases is limited to personnel working on each matter. FHFA outside counsel receive role-based privacy training and are likewise subject to professional rules of conduct which prohibit the misuse of client information. FHFA contracts also provide for contract termination if FHFA Controlled Unclassified Information is improperly used or disclosed. Although documents containing PII may be produced in litigation forums (e.g., in federal court or before the Equal Employment Opportunity Commission) and to opposing counsel, such sharing is independent of and unrelated to the use of Eve Legal.</p>

Section 3.0 Retention

The following questions address how long PII will be retained after the initial collection.

#	Question and Response
3.1	<p><i>How long is the PII retained?</i></p> <p>Information pertaining to a particular case, including any PII, is maintained in Eve Legal for as long as a matter is in litigation, including resolution of any appeals or until any appeal deadline has passed. Documents uploaded to Eve Legal are considered temporary and are destroyed when no longer needed for a business purpose. Documents created using Eve Legal are removed from the system and stored on FHFA’s network in accordance with the applicable record retention schedule.</p>
3.2	<p><i>Has a retention schedule been approved by FHFA’s Records Management Office and National Archives and Records Administration (NARA)? If yes, provide the corresponding General Record Schedule (GRS) or FHFA-specific Records Schedule number.</i></p> <p>GRS 5.2, Item 020 (Intermediary Records) Documents uploaded to Eve Legal are copies of documents stored elsewhere on FHFA’s network for the purposes of recordkeeping. Documents created using the system are stored on FHFA’s network.</p>

Section 4.0 Notice, Individual Access, and Correction

The following questions address notice to the individual, the individual's right to consent to uses of the PII, the individual's right to decline to provide PII, and the individual's ability to ensure the accuracy of the PII collected about them.

#	Question and Response
4.1	<p data-bbox="232 443 1458 510"><i>Is information about an individual retrieved by an individual's name or personal identifier such as name, email address, or date of birth? If yes, identify the applicable System of Record Notice (SORN).</i></p> <p data-bbox="232 646 277 674">No.</p>
4.2	<p data-bbox="232 798 1373 865"><i>How is notice about the collection of PII provided to an individual prior to collection from that individual? If notice is not provided, explain why.</i></p> <p data-bbox="232 968 1373 1035">Not applicable. PII is contained in existing documents and therefore is not collected directly from individuals for the purposes of this system.</p>
4.3	<p data-bbox="232 1152 1122 1180"><i>Is an individual's response to the request for PII voluntary or mandatory?</i></p> <p data-bbox="232 1323 412 1350">Not applicable.</p>
4.4	<p data-bbox="232 1491 1214 1518"><i>What are the consequences if an individual declines to provide the requested PII?</i></p> <p data-bbox="232 1661 412 1688">Not applicable.</p>

4.5	<p><i>What are the procedures that allow individuals to gain access to their PII?</i></p>
	<p>Not applicable. The system contains PII from existing documents. To the extent those documents are contained in a system of records subject to the Privacy Act, individuals may make Privacy Act requests with respect to those systems.</p>
4.6	<p><i>What are the procedures for individuals to correct or update information about them?</i></p>
	<p>Not applicable. The system contains PII from existing documents. To the extent those documents are contained in a system of records subject to the Privacy Act, individuals may make amendment requests under the Privacy Act with respect to those systems.</p>

Section 5.0 Sharing and Disclosure

The following questions address the content, scope, and authority for sharing PII.

#	Question and Response
5.1	<p><i>Is PII shared with other offices or divisions within FHFA? If yes, identify the other offices/divisions and describe the purpose of or business need for sharing the PII.</i></p> <p>No, PII from Eve Legal is not shared with individuals other than outside counsel. Although the underlying documents may be shared by the Office of General Counsel with other Agency divisions/offices as necessary to represent the Agency in litigation, such sharing is independent of and unrelated to the use of Eve Legal.</p>
5.2	<p><i>Is PII shared with individuals or entities outside of FHFA? External entities include other Federal agencies, state or local governments, regulated entities, FHFA-OIG, and Congress. External entities do not include FHFA contractors that receive PII as needed in their performance of work for FHFA. If yes, please identify the PII shared, and for what purpose or business need.</i></p>

	<p>No, PII from Eve Legal is not shared with individuals or entities outside of FHFA. Although underlying documents may be produced in litigation forums (e.g., in federal court or before the Equal Employment Opportunity Commission) and to opposing counsel, such sharing is independent of and unrelated to the use of Eve Legal.</p>
5.3	<p><i>If PII is shared with external entities, describe how the information sharing is compatible with the purpose for which the PII was collected.</i></p> <ul style="list-style-type: none"> • <i>If a SORN applies, identify the applicable routine uses in the SORN listed in Section 4.1.</i> • <i>If a SORN does not apply, describe 1) whether notice of the PII sharing was provided and if so, how; and 2) how the sharing of PII is consistent with the purpose for which the information was collected. Sharing with Congress, FHFA-OIG or the Government Accountability Office pursuant to the statutory authorities of those entities need not be addressed.</i> <p>Not applicable.</p>
5.4	<p><i>Describe how the risk of intentional or inadvertent disclosure of PII by FHFA employees/contractors is mitigated. (Address both disclosures within FHFA and disclosures to external parties.)</i></p> <p>Access to information related to FHFA cases is limited to the attorneys and support staff working on each matter. The risk of improper disclosure is further mitigated by providing privacy training, including role-based privacy training, to FHFA’s outside counsel. Attorneys representing FHFA are also subject to professional rules of conduct with respect to the confidentiality of client information. FHFA contracts also provide for contract termination if FHFA Controlled Unclassified Information is improperly used or disclosed.</p>
5.5	<p><i>If PII will be shared with external parties, describe how the risk of improper disclosure of the information by individuals or entities outside of FHFA is mitigated.</i></p>

	Not applicable.
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Section 6.0 Technical Access and Security

The following questions address technical safeguards and security measures.

#	Question and Response
6.1	<p><i>Will individuals other than FHFA employees and FHFA contractor personnel performing official FHFA duties have access to the system containing the PII? If yes, how will access to the system be granted and controlled with respect to these external parties?</i></p> <p>Technical support personnel from Eve Legal have access to the system via a support user account. However, Eve Legal personnel utilize this account only when actively providing customer support or investigating a technical issue.</p>
6.2	<p><i>Is any system-specific training or guidance related to PII or privacy provided to users of the system? If so, please describe.</i></p> <p>No.</p>
6.3	<p><i>Describe the technical/administrative safeguards in place to protect the PII.</i></p> <p>The Eve application is built and hosted on Amazon Web Services (AWS) infrastructure. The AWS infrastructure and services utilize both encryption at rest and in transit. Eve data (including database, logs, documents, and other flat files) are stored, “at rest” using AES 256 encryption. Keys used for encryption are managed either directly by AWS or through AWS key management services. All data transfer is encrypted in transit using TLS 1.2 or higher standards for encryption.</p>