



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Conroy Ross Partners Limited (Organization)
Decision number (file number)	P2013-ND-44 (File #P2496)
Date notice received by OIPC	October 24, 2013
Date Organization last provided information	November 15, 2013
Date of decision	January 23, 2014
Summary of decision	There is a real risk of significant harm to the individuals affected by this incident. The organization is required to notify those individuals pursuant to section 37.1 of the <i>Personal Information Protection Act</i> (PIPA).
JURISDICTION	
Section 1(1)(i) of PIPA “organization”	The Organization is an Alberta corporation. I have jurisdiction because the Organization is an “organization” as defined in section 1(1)(i)(i) of PIPA.
Section 1(1)(k) of PIPA “personal information”	The information at issue was contained in employment application packages and included the following information for 73 individuals: <ul style="list-style-type: none">• name,• home address,• email address,• phone number,• work experience,• education including scholarships and awards, and• references to personal interests.

	<p>The following information was also at issue for 67 of the individuals:</p> <ul style="list-style-type: none"> • student ID number, • birthday (not including year), • letter grades and GPA per course attended, • term GPA, and • program/degree type. <p>This information is “personal information” as defined in section 1(1)(k) of PIPA and was collected in Alberta.</p>
DESCRIPTION OF INCIDENT	
<p><input checked="" type="checkbox"/> loss <input type="checkbox"/> unauthorized access <input type="checkbox"/> unauthorized disclosure</p>	
Description of incident	<ul style="list-style-type: none"> • A laptop containing job applications was stolen from an employee’s vehicle. The laptop was password protected but not encrypted. • The laptop has not been recovered.
Affected individuals	73 individuals of which 72 are residents of Alberta.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> • A batchscript will run to delete all personal information on the computer if the computer is used to access the Internet. • The Organization has changed network passwords.
Steps taken to notify individuals of the incident	Notification sent by mail to affected individuals was completed on October 24, 2013.
REAL RISK OF SIGNIFICANT HARM ANALYSIS	
<p>Harm Some damage or detriment or injury – that could be caused to those affected individuals as a result of the incident. The harm must also be “significant.” It must be important, meaningful, and with non-trivial consequences or effects.</p>	<p>In my view, the personal information involved is of low to medium sensitivity. However, the amount of personal information – including a unique identifier (Student ID) for some individuals – provides comprehensive individual profiles that could be used to cause identity theft and/or fraud. In addition, the email addresses could be used for phishing purposes. These are significant harms.</p>
<p>Real Risk The likelihood that the significant harm will result must be more than mere</p>	<p>I considered the following factors in deciding whether there is a real risk of significant harm resulting from this incident:</p> <ul style="list-style-type: none"> • The laptop was stolen and has not been recovered.

<p>speculation or conjecture. There must be a cause and effect relationship between the incident and the possible harm.</p>	<ul style="list-style-type: none"> • The laptop was password protected but not encrypted. • All personal information on the laptop will be deleted automatically if the computer is used to access the internet; however, if the computer is not used to access the internet, the information would not be deleted and would be accessible.
<p>DECISION UNDER SECTION 37.1(1) OF PIPA</p>	
<p>Based on the information provided by the Organization and given the circumstances of the incident, I have decided that there is a real risk of significant harm to the affected individuals. The personal information involves a large amount of personal information that, in combination, could be used for identity theft/fraud. The laptop was stolen and not recovered. It was not encrypted. These factors contributed significantly to my decision.</p> <p>I require the Organization to notify the affected individuals in Alberta in accordance with section 19.1 of the <i>Personal Information Protection Act Regulation</i> (Regulation).</p> <p>I understand the Organization notified all affected individuals by letter by October 24, 2013 in accordance with the Regulation.</p> <p>The Organization is, therefore, not required to notify the affected individuals again.</p>	

Jill Clayton
Information and Privacy Commissioner