



**PERSONAL INFORMATION PROTECTION ACT**  
**Breach Notification Decision**

<b>Organization providing notice under section 34.1 of PIPA</b>	Mawer Investment Management (Organization)
<b>Decision number (file number)</b>	P2015-ND-01 (File #P2856)
<b>Date notice received by OIPC</b>	September 18, 2014
<b>Date Organization last provided information</b>	December 17, 2014
<b>Date of decision</b>	January 12, 2015
<b>Summary of decision</b>	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).
<b>JURISDICTION</b>	
<b>Section 1(1)(i) of PIPA “organization”</b>	<p>The Organization is incorporated in Alberta. The Organization reported that the information at issue was collected in Alberta.</p> <p>I have jurisdiction because the Organization is an “organization” as defined in section 1(1)(i)(i) of PIPA.</p>
<b>Section 1(1)(k) of PIPA “personal information”</b>	<p>The incident involved the following information about the affected individuals:</p> <ul style="list-style-type: none"><li>• name,</li><li>• home address,</li><li>• telephone number,</li><li>• Mawer account number,</li><li>• investment account information,</li><li>• Social Insurance Number (one individual)</li></ul> <p>This information is “personal information” as defined in section 1(1)(k) of PIPA and was collected in Alberta.</p>

<b>DESCRIPTION OF INCIDENT</b>	
<input type="checkbox"/> loss <input checked="" type="checkbox"/> unauthorized access <input type="checkbox"/> unauthorized disclosure	
<b>Description of incident</b>	<ul style="list-style-type: none"> <li>• The Organization’s web server was compromised between September 3, 2014 and September 4, 2014.</li> <li>• Unauthorized access to personal information was gained as a result.</li> </ul>
<b>Affected individuals</b>	A total of twelve individuals were affected, two of whom are residents of Alberta.
<b>Steps taken to reduce risk of harm to individuals</b>	<ul style="list-style-type: none"> <li>• The Organization reported that an investigation into the breach was conducted and the cause of the breach determined and addressed.</li> <li>• One year of fraud protection services was made available to each affected individual.</li> <li>• Features that allow individuals to submit personal information via the website were removed.</li> <li>• Personal information previously submitted to the website was removed.</li> <li>• An ongoing monitoring mechanism to monitor activities on the website has been implemented.</li> </ul>
<b>Steps taken to notify individuals of the incident</b>	The Organization reported that the affected individuals were notified directly.
<b>REAL RISK OF SIGNIFICANT HARM ANALYSIS</b>	
<b>Harm</b> Some damage or detriment or injury that could be caused to 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.	The Organization recognized the affected individuals are at risk of harm.  In my view, the personal information involved is highly sensitive. The types of harm that could result from unauthorized access to the personal information in this instance are identity theft and fraud. In my view, these are significant harms.

<p><b>Real Risk</b>  The likelihood that the significant harm will result must be more than mere speculation or conjecture. There must be a cause and effect relationship between the incident and the possible harm.</p>	<p>The Organization reported that due to the sensitivity of the personal information involved, there is a real risk of significant harm to the affected individuals.</p> <p>In my view, the likelihood of harm resulting from this incident is increased because the breach is the result of malicious intent.</p>
<p><b>DECISION UNDER SECTION 37.1(1) OF PIPA</b></p>	
<p>Based on the information provided by the Organization and given that personal information was accessed by an unauthorized individual with malicious intent, I have decided that there is a real risk of significant harm to the affected individuals. In addition, the personal information involved sensitive identity information and social insurance number for one individual. These factors contributed significantly to my decision.</p> <p>I require the Organization to notify the affected individuals in accordance with section 19.1 of the <i>Personal Information Protection Act Regulation</i> (Regulation).</p> <p>I understand the Organization notified the affected individuals in accordance with the Regulation. The Organization is, therefore, not required to notify the affected individuals again.</p>	

Jill Clayton  
Information and Privacy Commissioner