



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

<b>Organization providing notice under section 34.1 of PIPA</b>	United Farmers of Alberta (UFA) Co-Operative Ltd. (Organization)
<b>Decision number (file number)</b>	P2015-ND-30 (File #000617)
<b>Date notice received by OIPC</b>	April 14, 2015
<b>Date Organization last provided information</b>	April 29, 2015
<b>Date of decision</b>	May 15, 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>	The Organization is incorporated in Alberta by a Special Act of the Legislature.  I have jurisdiction because the Organization is an “organization” as defined in section 1(1)(i)(i) of PIPA.
<b>Section 1(1)(k) of PIPA “personal information”</b>	The incident involved all or some of the following information: <ul style="list-style-type: none"><li>• customer name and/or business name,</li><li>• customer address,</li><li>• customer telephone number (work, home and/or cell phone),</li><li>• credit card number,</li><li>• expiry date,</li><li>• UFA account number.</li></ul> This information is “personal information” as defined in section 1(1)(k) of PIPA and was collected in Alberta.

<b>DESCRIPTION OF INCIDENT</b>	
<input checked="" 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>• On April 13, 2015 thieves broke into the Organization’s premises and stole the safe and cash register. Index cards, containing customer credit card data and other personal information for 120 accounts, were stored in the stolen safe.</li> <li>• The information has not been recovered.</li> </ul>
<b>Affected individuals</b>	A total of 148 individuals were affected, all of whom were Alberta residents.
<b>Steps taken to reduce risk of harm to individuals</b>	<ul style="list-style-type: none"> <li>• The police were notified.</li> <li>• The affected individuals were immediately notified by telephone and later in writing.</li> <li>• The Organization has formed a task force to review its business processes and how credit card information is collected.</li> <li>• The Organization no longer stores all customer personal information together and is reviewing more secure processes and storage and elimination of hard-copy paper forms.</li> <li>• The Credit Card Use Authorization forms have been revised to ensure that minimal and relevant information only is collected.</li> </ul>
<b>Steps taken to notify individuals of the incident</b>	<ul style="list-style-type: none"> <li>• Individuals were notified by telephone on the same date as the incident. The Organization also sent out written notifications on April 16, 2015.</li> </ul>
<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 may be at risk for financial fraud and identity theft.  I agree with the Organization. The personal information involved is sensitive and could be used to cause the harms of financial fraud and identity theft. In my view, these are significant harms.
<b>Real Risk</b> The likelihood that the significant harm will result must be more than mere	The Organization reported that it considered there to be a significant risk of harm to the affected individuals.  I agree with the Organization. The breach resulted from a

<p>speculation or conjecture. There must be a cause and effect relationship between the incident and the possible harm.</p>	<p>break-in and theft. The stolen information has not been recovered.</p>
<p><b>DECISION UNDER SECTION 37.1(1) OF PIPA</b></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 involved is sensitive and could be used to cause the harms of financial fraud and identity theft. In my view, these are significant harms. The breach resulted from a break-in and theft. The stolen information has not been recovered. 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 plan members in a letter dated April 16, 2015, in accordance with the Regulation. Therefore, the Organization is not required to notify the affected individuals again.</p>	

Jill Clayton  
Information and Privacy Commissioner