



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

<b>Organization providing notice under section 34.1 of PIPA</b>	Connect First Credit Union Ltd. (Organization)
<b>Decision number (file number)</b>	P2015-ND-37 (Case File #000506)
<b>Date notice received by OIPC</b>	March 23, 2015
<b>Date Organization last provided information</b>	March 26, 2015
<b>Date of decision</b>	May 19, 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.  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 the following information: <ul style="list-style-type: none"><li>• name,</li><li>• telephone number,</li><li>• home address,</li><li>• date of birth,</li><li>• Social Insurance Number (SIN),</li><li>• driver's license number,</li><li>• credit card number,</li><li>• bank account number.</li></ul> This information is “personal information” as defined in section 1(1)(k) of PIPA and was collected in Alberta.

**DESCRIPTION OF INCIDENT**

loss                     
 unauthorized access                     
 unauthorized disclosure

<b>Description of incident</b>	<ul style="list-style-type: none"> <li>• Credit Union Central Alberta Ltd. (Alberta Central) is the central banking facility, service bureau and trade association for Alberta's credit unions. Alberta Central, and its joint venture companies, provide payment and technology services to credit unions, including the Organization.</li> <li>• On March 11, 2015, Alberta Central notified the Organization that paper records in its custody, containing personal information of the Organization's members, had been inadvertently stored in an unlocked basement room between October 2014 and January 19, 2015.</li> <li>• The unlocked room was accessible to 258 employees of Alberta Central and other entities operating within the same facility.</li> </ul>
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<b>Affected individuals</b>	101 individuals were affected by the incident.
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<b>Steps taken to reduce risk of harm to individuals</b>	<p>The Organization reported that Alberta Central:</p> <ul style="list-style-type: none"> <li>• immediately moved the boxes to a room with locked doors and limited access;</li> <li>• inventoried the records on January 21, 2015;</li> <li>• conducted a risk assessment to determine the impact of potential unauthorized access of personal information to affected individuals; and</li> <li>• investigated the incident.</li> </ul>
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<b>Steps taken to notify individuals of the incident</b>	Affected individuals were notified.
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**REAL RISK OF SIGNIFICANT HARM ANALYSIS**

<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.	<p>The Organization reported that Alberta Central assessed that affected individuals may be at risk of identity theft and fraud.</p> <p>The personal information involved is sensitive and contains identity and financial information. I agree this information could be used to cause the harms of identity theft and fraud. In my view, these are significant harms.</p>
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<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 Alberta Central assessed the likelihood of harm as low because of the remote location of the records, and the limited number of individuals who could have accessed the records. In addition, the general public does not have access to the area of the building where the records were stored, the incident did not result from malicious intent, and there is no evidence of theft or misappropriation of the records.</p> <p>In my view, the likelihood of harm resulting from this incident is increased because of the length of time the personal information was unsecured (approximately 4 months). Although the incident was not the result of malicious intent, some 258 individuals potentially had access to the unlocked room. Further, it is not possible to confirm that the room and records were not accessed during this period.</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 affected individuals. The personal information could be used to cause the significant harms of identity theft and fraud. The likelihood of harm resulting from this incident is increased because of the length of time the personal information was unsecured (approximately 4 months). Although the incident was not the result of malicious intent, some 258 individuals potentially had access to the unlocked room. Further, it is not possible to confirm that the room and records were not accessed during this period. 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 individuals affected by the incident in accordance with section 19.1 of the Regulation. The Organization is, therefore, not required to notify the affected individuals again.</p>	

Jill Clayton  
Information and Privacy Commissioner