



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Carson Integrated Ltd. (Organization)
File number	P2015-ND-55 (File #001192)
Date notice received by OIPC	July 16, 2015
Date Organization last provided information	August 18, 2015
Date of decision	August 27, 2015
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 34.1(1) of the <i>Personal Information Protection Act</i> (PIPA).
JURISDICTION	
Section 1(1)(i) of PIPA “organization”	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.
Section 1(1)(k) of PIPA “personal information”	<p>The incident involved the following information:</p> <ul style="list-style-type: none">• social insurance number,• date of birth,• address,• telephone number,• copies of driver’s licences,• banking information (bank account number),• health care number. <p>This information is about identifiable individuals and is “personal information” as defined in section 1(1)(k) of PIPA.</p>
DESCRIPTION OF INCIDENT	
<input checked="" type="checkbox"/> loss <input type="checkbox"/> unauthorized access <input type="checkbox"/> unauthorized disclosure	

Description of incident	<ul style="list-style-type: none"> • On July 5, 2015, an unknown individual entered the Organization’s office and stole a laptop containing Human Resources information. • The laptop was password protected but not encrypted.
Affected individuals	The Organization reported approximately 100 individuals were affected.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> • The Organization notified the police on July 5, 2015 and initiated an internal investigation. • Passwords to access information stored on the laptop were changed and access to the affected email account was shut down. • IT staff were contacted to attend to the situation and reduce risk factors. The Organization has been monitoring database access from the laptop and reported no unauthorized access to databases containing confidential information. • The Organization has enhanced physical and technological security measures.
Steps taken to notify individuals of the incident	The Organization notified affected individuals by letter dated July 21, 2015.
REAL RISK OF SIGNIFICANT HARM ANALYSIS	
<p>Harm 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>	<p>The Organization reported that the harm that could result from this breach includes “identity theft and negative effects on a credit record” and that the information at issue is of medium sensitivity because it included social insurance numbers, driver’s licence copies and banking information.</p> <p>I agree with the Organization that the information at issue could be used to cause the significant harms of identity theft and fraud.</p>
<p>Real Risk 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 the information on the laptop was “buried within a file system and it would not be obvious where to find the information.” In addition, the Organization believes the laptop was the target of the theft, not the information stored on it.</p> <p>In my view, the likelihood of harm resulting from this incident is increased because the personal information was stolen, indicating malicious intent. Further, the information has not been recovered. The laptop was password protected but not encrypted.</p>

DECISION UNDER SECTION 37.1(1) OF PIPA

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 at issue could be used to cause the significant harms of identity theft and fraud. The personal information was stolen, indicating malicious intent. Further, the information has not been recovered. The laptop was password protected but not encrypted.

I require the Organization to notify affected individuals in accordance with section 19.1 of the *Personal Information Protection Act Regulation* (Regulation). I understand the Organization notified affected individuals by letter dated July 21, 2015. The Organization is not required to notify the affected individuals again.

Jill Clayton
Information and Privacy Commissioner