



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

<b>Organization providing notice under section 34.1 of PIPA</b>	Verizon Canada Ltd. (Organization)
<b>Decision number (file number)</b>	P2015-ND-57 (File #P2911)
<b>Date notice received by OIPC</b>	November 19, 2014
<b>Date Organization last provided information</b>	September 21, 2015
<b>Date of decision</b>	October 19, 2015
<b>Summary of decision</b>	There is a real risk of significant harm to the individual 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>	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>• address,</li><li>• Social Insurance Number, and</li><li>• year to date salary information for six months.</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 checked="" type="checkbox"/> loss <input type="checkbox"/> unauthorized access <input type="checkbox"/> unauthorized disclosure	

<b>Description of incident</b>	The Organization’s copy of an employee’s Record of Employment (ROE) was accidentally discarded by a janitorial service.
<b>Affected individuals</b>	One individual from Alberta was affected.
<b>Steps taken to reduce risk of harm to individuals</b>	<ul style="list-style-type: none"> <li>• The Organization conducted an internal review.</li> <li>• A new cleaning schedule was implemented on October 24, 2014. Janitorial services in the affected area now take place during business hours to ensure services are monitored.</li> <li>• Credit monitoring was provided to the affected individual.</li> </ul>
<b>Steps taken to notify individuals of the incident</b>	A letter of notification was mailed to the affected individual in November 2014.

**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 did not provide an assessment of harm, but reported that the personal information at issue included name, address, Social Insurance Number and salary information. The Organization offered the individual credit monitoring services.</p> <p>The personal information involved includes sensitive identity information which could be used to cause the harms of identity theft and fraud. 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>The Organization reported that there is no evidence the personal information has been accessed or misused.</p> <p>In my view, the lack of malicious intent reduces the risk of harm resulting from this incident. However, the personal information was accidentally discarded and has not been recovered. The Organization did not provide any additional information to indicate the risk of harm has been mitigated.</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 individual. The personal information involves sensitive identity information, including Social Insurance Number. The information was accidentally discarded and has not been recovered. The Organization did not provide any additional information to indicate the risk of harm has been mitigated.

I require the Organization to notify the affected individuals in accordance with section 19.1 of the *Personal Information Protection Act Regulation* (Regulation).

I understand the Organization notified the affected individual in November 2014, in accordance with the Regulation. The Organization is, therefore, not required to notify the affected individuals again.

Jill Clayton  
Information and Privacy Commissioner