



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Co-operative Superannuation Society Pension Plan (Organization)
Decision number (file number)	P2015-ND-71 (File # 2771)
Date notice received by OIPC	July 14, 2014
Date Organization last provided information	November 2, 2015
Date of decision	November 2, 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 37.1 of the <i>Personal Information Protection Act</i> (PIPA).
JURISDICTION	
Section 1(1)(i) of PIPA “organization”	The Organization is an “organization” as defined in section 1(1)(i) of PIPA.
Section 1(1)(k) of PIPA “personal information”	The incident involved the following information: <ul style="list-style-type: none">• name,• Social Insurance Number, and• pension contribution amount. <p>This information is about identifiable individuals and qualifies as “personal information” as defined in section 1(1)(k) of PIPA. The information was collected in Alberta.</p>
DESCRIPTION OF INCIDENT	
<input type="checkbox"/> loss <input type="checkbox"/> unauthorized access <input checked="" type="checkbox"/> unauthorized disclosure	

<p>Description of incident</p>	<ul style="list-style-type: none"> • The personal information at issue was exposed to the public internet due to a security malfunction. • The incident was discovered on July 20, 2014, by an individual searching his/her own name on Google. • The Organization does not know how long the information was exposed.
<p>Affected individuals</p>	<p>The Organization reported a total of 5649 potentially affected individuals across Canada.</p>
<p>Steps taken to reduce risk of harm to individuals</p>	<p>Offered a credit monitoring service to affected individuals.</p>
<p>Steps taken to notify individuals of the incident</p>	<p>All affected individuals were directly notified between July 15 and September 4, 2014.</p>
<p>REAL RISK OF SIGNIFICANT HARM ANALYSIS</p>	
<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 affected individuals may be at risk for identity theft and fraud, and that the harm is significant due to the exposure of Social Insurance Numbers.</p> <p>I agree with the Organization. The personal information involved includes sensitive identity information. This information could be used to cause the harms of identity theft, and fraud, which are significant harms.</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 there was no evidence of malicious intent, but it does not know how long the information was exposed.</p> <p>I agree that the absence of malicious intent reduces the likelihood of harm resulting from this incident. However, it is not clear to me from the Organization’s report of this incident how the incident occurred, or the number of individuals who potentially had access to the personal information at issue. Both of these factors influence the likelihood of harm. In addition, the likelihood of harm is increased the longer the information was exposed. In this case, the Organization is not able to confirm how long the information was exposed.</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 involved sensitive identity information that could be used to cause the significant harms of identity theft and fraud. While the absence of malicious intent reduces the likelihood of harm resulting from this incident, it is not clear to me from the Organization's report how the incident occurred, or the number of individuals who potentially had access to the personal information at issue. Both of these factors influence the likelihood of harm. In addition, the likelihood of harm is increased the longer the information was exposed and the Organization is not able to confirm how long the information was exposed.

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 affected individuals in accordance with the Regulation. The Organization is, therefore, not required to notify the affected individuals again.

Jill Clayton
Information and Privacy Commissioner