



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

<b>Organization providing notice under section 34.1 of PIPA</b>	Trident Limited Partnership (Organization)
<b>Decision number (file number)</b>	P2016-ND-14 (File #P002342)
<b>Date notice received by OIPC</b>	January 25, 2016
<b>Date Organization last provided information</b>	January 26, 2016
<b>Date of decision</b>	March 15, 2016
<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 a partnership as defined in the <i>Partnership Act</i> and qualifies as an “organization” as defined in section 1(1)(i)(iv) of PIPA.
<b>Section 1(1)(k) of PIPA “personal information”</b>	<p>The information at issue includes the following:</p> <ul style="list-style-type: none"><li>• name,</li><li>• address,</li><li>• Social Insurance Number, and</li><li>• salary, including earnings and deductions.</li></ul> <p>This information is about identifiable individuals and is “personal information” as defined in section 1(1)(k) of PIPA. The information 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>	<ul style="list-style-type: none"> <li>• A package containing payroll information was to be delivered by a courier; however a thief broke into the vehicle during transportation and stole the package.</li> <li>• The package has not been recovered.</li> </ul>
<b>Affected individuals</b>	There were 51 affected Albertans.
<b>Steps taken to reduce risk of harm to individuals</b>	<ul style="list-style-type: none"> <li>• Organization has removed reports that contain social insurance numbers from the packages being delivered.</li> <li>• Organization has offered credit monitoring for one year for affected individuals.</li> </ul>
<b>Steps taken to notify individuals of the incident</b>	Notification sent by email to affected individuals on December 29, 2015.

**REAL RISK OF SIGNIFICANT HARM ANALYSIS**

<p><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>	<p>The Organization recognized the affected individuals may be at risk for identity theft and fraud as a result of the incident.</p> <p>I agree with the Organization. The personal information involved includes sensitive identity and financial information. This information could be used to cause the harms of identity theft and fraud. 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 “harm would definitely result if the package is opened and perpetrator decides to use/sell the information.”</p> <p>In my view, the likelihood of harm resulting from this incident is increased because the personal information was stolen, indicating malicious intent. The information has not been recovered.</p>
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**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 includes sensitive identity and financial information which could be used to cause the significant harms of identity theft and fraud. The likelihood of harm resulting from this incident is increased because the personal information was stolen, indicating malicious intent. The information has not been recovered.

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 individuals via email on December 29, 2015 in accordance with the Regulation. The Organization is therefore not required to notify the individuals again.

Jill Clayton  
Information and Privacy Commissioner