



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Christian Credit Union Ltd. (Organization)
Decision number (file number)	P2018-ND-041 (File #007837)
Date notice received by OIPC	February 14, 2018
Date Organization last provided information	February 14, 2018
Date of decision	March 5, 2018
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 incorporated in Alberta and is an “organization” as defined in section 1(1)(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">• name,• address,• telephone number,• account number,• transit number,• route number, and• signatures. <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>
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"> • On November 6, 2017, an employee of the Organization sent a fax to an incorrect number. When the Organization did not receive a response to the fax request, the fax was re-sent on November 30, 2017, to the same incorrect number. • The error was discovered on January 31, 2018, when the individual who received the fax reported the error to the Organization, advising that he had called the branch after he received the fax the first time. The Organization has no record of this previous report. The unintended recipient also reported that he shredded the faxes when he received them.
<p>Affected individuals</p>	<p>The incident affected two (2) individuals.</p>
<p>Steps taken to reduce risk of harm to individuals</p>	<ul style="list-style-type: none"> • Recipient of the fax indicated that he shredded the faxes. • Organization employees were notified of a breach due to an incorrect fax number and to take care and caution and to double-check fax numbers before sending. • A new account number will be assigned to the members and the breached account number will be closed so no fraudulent cheques will be processed. • The members' accounts are being monitored daily by the Risk Manager to ensure that no fraudulent cheques nor any suspicious or unusual activity is happening in the account.
<p>Steps taken to notify individuals of the incident</p>	<p>Affected individuals were contacted first by telephone and then letter dated February 14, 2018.</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 “Financial loss may occur to the member and the Credit Union as fraudulent cheques could be created and processed as the members' signatures and all necessary cheque information was breached.”</p> <p>I accept the Organization’s assessment that the contact and financial information at issue could be used to cause the significant harms of fraud and financial loss.</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 “The recipient [sic] of the fax received sensitive financial information. This information was in his possession for possibly 2 months before the [Organization] was made aware of it. The information breached was sensitive as the members' signatures and banking information was released...There is no evidence of malicious intent or purpose. A copy of the information was recovered and the recipient advised that he shredded the faxes but it is still a possibility that the information could have been released or viewed by someone else. There are 2</p>

	<p>members affected by the breach and neither are seniors nor youth.”</p> <p>In my view, there is a real risk of significant harm resulting from this incident, despite the fact the incident did not result from malicious intent, but rather human error. The information was exposed for approximately 2 months. Although the unintended recipient advised that he had shredded the faxes, it is still a possibility that the information could have been released or viewed by someone else.</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.

Despite the fact the incident did not result from malicious intent, but rather human error, the information was exposed for approximately 2 months. Although the unintended recipient advised that he had shredded the faxes, it is still a possibility that the information could have been released or viewed by someone else.

The Organization is required to notify the affected individuals in Alberta in accordance with section 19.1 of the *Personal Information Protection Act Regulation* (Regulation).

I understand that affected individuals were contacted first by telephone and then letter dated February 14, 2018. The Organization is not required to notify the affected individuals again.

Jill Clayton
Information and Privacy Commissioner