



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

<b>Organization providing notice under section 34.1 of PIPA</b>	PricewaterhouseCoopers LLP (Organization)
<b>Decision number (file number)</b>	P2018-ND-098 (File #009352)
<b>Date notice received by OIPC</b>	July 27, 2018
<b>Date Organization last provided information</b>	July 27, 2018
<b>Date of decision</b>	August 7, 2018
<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 the individuals in Alberta 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 operates in Alberta and is an “organization” as defined in section 1(1)(i) of PIPA.
<b>Section 1(1)(k) of PIPA “personal information”</b>	<p>The information involved varies by individual but includes:</p> <ul style="list-style-type: none"><li>• name,</li><li>• address,</li><li>• telephone number,</li><li>• social insurance number,</li><li>• tax documents,</li><li>• bank documents, and</li><li>• investment account information.</li></ul> <p>This information is about identifiable individuals and is “personal information” as defined in section 1(1)(k) of PIPA.</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>• On July 13, 2018, two individuals burglarized the Organization’s premises in Edmonton.</li><li>• A number of personal items were stolen along with documents containing the information at issue.</li></ul>

	<ul style="list-style-type: none"> <li>The incident was discovered on July 14, 2018, when employees discovered items were missing and there appeared to have been a break in.</li> </ul>
<b>Affected individuals</b>	The incident affected 5 individuals, 2 of whom are deceased.
<b>Steps taken to reduce risk of harm to individuals</b>	<ul style="list-style-type: none"> <li>Reported the incident to law enforcement.</li> <li>Notified the affected individuals, informed them of steps they can take, and offered free credit monitoring to the living individuals for three years.</li> <li>Changed the locks and further enhancements to security are being explored with building management.</li> </ul>
<b>Steps taken to notify individuals of the incident</b>	Affected individuals were notified in writing on July 27, 2018.
<b>REAL RISK OF SIGNIFICANT HARM ANALYSIS</b>	
<p><b>Harm</b> Some damage or detriment or injury that could be caused to the 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 harms that may result from the breach are fraud and identity theft, although there is no evidence of such harms occurring in this case.”</p> <p>In my view, the identity and financial information at issue could be used to cause the significant harms of identity theft and fraud.</p>
<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 “The likelihood of harm is low because the unauthorized individuals that accessed [the] premises appear to have been motivated by quick financial gain, given that many of the items that were stolen are staff member's personal items (eg. jackets, shoes, workout items, etc.), electronics, alcohol, and other such items. There is no evidence that the affected individuals were targeted and no evidence that the unauthorized access was done with the purpose of harming individuals through the use of personal information ...We have also offered free credit monitoring for three years to the 3 living individuals affected, which should significantly reduce the likelihood that harm could result. Furthermore, one of the two individuals that gained unauthorized access ...has been identified by the police and we believe is likely to be apprehended.”</p> <p>In my view, there is a real risk of harm resulting from this incident. The breach was the result of malicious intent (deliberate break-in and theft of documents). The Organization can only speculate as to the motives of the perpetrators, and did not report recovering the information. The fact that there is as yet no evidence of harms occurring does not mitigate potential harm, as unauthorized use of the information could still occur at any time in the future.</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 as a result of this incident.

The identity and financial information at issue could be used to cause the significant harms of identity theft and fraud. The breach was the result of malicious intent (deliberate break-in and theft of documents). The Organization can only speculate as to the motives of the perpetrators, and did not report recovering the information. The fact that there is as yet no evidence of harms occurring does not mitigate potential harm, as unauthorized use of the information could still occur at any time in the future.

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

The Organization reported that affected individuals were notified in writing on July 27, 2018. The Organization is not required to notify the affected individuals again.

Jill Clayton  
Information and Privacy Commissioner