



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

<b>Organization providing notice under section 34.1 of PIPA</b>	Last Callum Corp. (Organization)
<b>Decision number (file number)</b>	P2019-ND-052 (File #011396)
<b>Date notice received by OIPC</b>	December 20, 2018
<b>Date Organization last provided information</b>	December 20, 2018
<b>Date of decision</b>	May 3, 2019
<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 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>	The incident involved the following information: <ul style="list-style-type: none"><li>• first and last name,</li><li>• banking information (branch, transit and bank account number).</li></ul> This information is about identifiable individuals and is “personal information” as defined in section 1(1)(k) of PIPA.
<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>• The Organization reported the incident as follows: “Home break in, purse stolen with a notebook inside that had payroll information”.</li><li>• The breach occurred on December 19, 2018 and was discovered the same day.</li></ul>
<b>Affected individuals</b>	The breach affected 17 individuals.

<b>Steps taken to reduce risk of harm to individuals</b>	<ul style="list-style-type: none"> <li>• Advising potentially affected individuals so they can monitor their account.</li> <li>• Changed the procedure for recording payroll information as of October 2018.</li> <li>• Installing security system at home.</li> <li>• Reported breach to law enforcement.</li> </ul>
<b>Steps taken to notify individuals of the incident</b>	The Organization reported that on December 20, 2018, it “advised staff of the theft and that their name/account number could have been stolen with the theft posting in stores and email”.
<b>REAL RISK OF SIGNIFICANT HARM ANALYSIS</b>	
<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 reported that “...this is not enough information for anyone to be able to take money or do anything else with someones [sic] bank account”.</p> <p>In my view, a reasonable person would consider that the financial information at issue could be used to cause the significant harms of identity theft, fraud and financial loss.</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>In assessing the likelihood of harm resulting from this incident, the Organization reported that it was “unlikely”.</p> <p>In my view, a reasonable person would consider that the likelihood of harm resulting in this case is increased because the breach resulted from malicious intent (home break-in and theft). The personal information has not been recovered.</p>
<b>DECISION UNDER SECTION 37.1(1) OF PIPA</b>	
<p>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.</p> <p>A reasonable person would consider that the financial information at issue could be used to cause the significant harms of identity theft, fraud and financial loss. The likelihood of harm resulting in this case is increased because the breach resulted from malicious intent (home break-in and theft). The personal information has not been recovered.</p> <p>I require the Organization to notify the affected individuals in accordance with section 19.1 of the <i>Personal Information Protection Act Regulation</i> (Regulation).</p>	

I understand the affected individuals were notified of the breach on December 20, 2018. The Organization is not required to notify the affected individuals again.

Jill Clayton  
Information and Privacy Commissioner