



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Mayfield Management Group Ltd. (Organization)
Decision number (file number)	P2019-ND-061 (File #004095)
Date notice received by OIPC	October 19, 2016
Date Organization last provided information	October 19, 2016
Date of decision	May 13, 2019
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”	I have jurisdiction because the Organization operates in Alberta and is an “organization” as defined in section 1(1)(i)(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,• date of birth,• address,• employment information,• banking information,• Social Insurance Number (SIN). <p>This information is about identifiable individuals and is “personal information” as defined in section 1(1)(k) of PIPA.</p>
DESCRIPTION OF INCIDENT	
<input checked="" type="checkbox"/> loss <input type="checkbox"/> unauthorized access <input type="checkbox"/> unauthorized disclosure	
Description of incident	<ul style="list-style-type: none">• A break-in occurred at the Organization’s office sometime between October 15, 2016 and October 17, 2016. The theft was discovered on October 17.• Files containing personal information about residents were stolen.

Affected individuals	The incident affected 75 individuals.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> • Reported incident to the RCMP. • Removed files containing personal information from all of the Organization’s site offices. • Implemented processing and procedural changes. • Provided two years free credit monitoring and protection to affected individuals.
Steps taken to notify individuals of the incident	Affected individuals were notified by letter dated October 19, 2016.
REAL RISK OF SIGNIFICANT HARM ANALYSIS	
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>The Organization reported that harms that might result from the breach included “Possible identity theft, financial loss and negative effects on a credit record”.</p> <p>I agree with the Organization’s assessment. A reasonable person would consider that the contact, identity, financial and employment information at issue could be used to cause the significant harms of identity theft and fraud.</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>In assessing the likelihood of harm resulting from this breach, the Organization considered:</p> <ul style="list-style-type: none"> • “The information is sensitive” • “Theft of records” • “The information could be used for criminal purposes such as identify [sic] theft or fraud” • “Five seniors have been effected” <p>In my view, a reasonable person would consider the likelihood of harm resulting from this incident is increased because the breach resulted from malicious intent (theft), the information has not been recovered, and the affected individuals are part of a vulnerable population (seniors).</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.	

A reasonable person would consider that the contact, identity, financial and employment information at issue 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 breach resulted from malicious intent (theft), the information has not been recovered, and the affected individuals are part of a vulnerable population (seniors).

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 affected individuals were notified by letter dated October 19, 2016. The Organization is not required to notify the affected individuals again.

Jill Clayton
Information and Privacy Commissioner