



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

<b>Organization providing notice under section 34.1 of PIPA</b>	Lancaster Archery Supply, Inc. (Organization)
<b>Decision number (file number)</b>	P2019-ND-195 (File #013212)
<b>Date notice received by OIPC</b>	May 3, 2019
<b>Date Organization last provided information</b>	May 3, 2019
<b>Date of decision</b>	December 16, 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 the individuals whose personal information was collected 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 is an “organization” as defined in section 1(1)(i) of PIPA.
<b>Section 1(1)(k) of PIPA “personal information”</b>	Information involved in the breach included: <ul style="list-style-type: none"><li>• name,</li><li>• credit or debit card number, expiry date and security code.</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 via the Organization’s websites, <a href="http://www.lancasterarchery.com">www.lancasterarchery.com</a> and <a href="http://www.lancasterarcherydealer.com">www.lancasterarcherydealer.com</a>.</p>
<b>DESCRIPTION OF INCIDENT</b>	
<input type="checkbox"/> loss <input checked="" type="checkbox"/> unauthorized access <input type="checkbox"/> unauthorized disclosure	
<b>Description of incident</b>	<ul style="list-style-type: none"><li>• On April 3, 2019, the Organization became aware that certain payment card information used at <a href="http://www.lancasterarchery.com">www.lancasterarchery.com</a> and <a href="http://www.lancasterarcherydealer.com">www.lancasterarcherydealer.com</a> may have been compromised from July 4, 2018 through February 8, 2019, February 11, 2019 through February 14, 2019, and on February 16, 2019.</li></ul>

	<ul style="list-style-type: none"> <li>The incident was discovered when the Organization received a report of unusual card activity from its credit card processor.</li> </ul>
<b>Affected individuals</b>	The incident affected 35 Alberta residents.
<b>Steps taken to reduce risk of harm to individuals</b>	Investigated and worked with a third-party forensic investigator, law enforcement, and credit card processor to determine the nature and scope of this event.
<b>Steps taken to notify individuals of the incident</b>	Affected individuals were notified by letter on April 25, 2019.
<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.	The Organization reported that it is “...is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/ or bank”.  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 and fraud.
<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.	The Organization did not specifically assess the likelihood of harm resulting from this incident.  In my view, a reasonable person would consider the likelihood of harm resulting from this incident is increased as the breach appears to be the result of malicious intent (deliberate action). The information appears to have been exposed for over 7 months.
<b>DECISION UNDER SECTION 37.1(1) OF PIPA</b>	
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 and financial 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 as the breach appears to be the result of malicious intent (deliberate action). The information appears to have been exposed for over 7 months.	

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

I understand affected individuals were notified by letter on April 25, 2019. The Organization is not required to notify affected individuals again.

Jill Clayton  
Information and Privacy Commissioner