



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

<b>Organization providing notice under section 34.1 of PIPA</b>	Christian Labour Association of Canada (Organization)
<b>Decision number (file number)</b>	P2021-ND-018 (File #015212)
<b>Date notice received by OIPC</b>	June 20, 2019
<b>Date Organization last provided information</b>	June 20, 2019
<b>Date of decision</b>	February 16, 2021
<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 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>	<p>The incident involved all or some of the following information:</p> <ul style="list-style-type: none"><li>• name,</li><li>• address,</li><li>• telephone number,</li><li>• email address,</li><li>• employment history, and</li><li>• education history.</li></ul> <p>This information is about identifiable individuals and is “personal information” as defined in section 1(1)(k) of PIPA. To the extent the information was collected in Alberta, PIPA applies.</p>
<b>DESCRIPTION OF INCIDENT</b>	
<input type="checkbox"/> loss <input type="checkbox"/> unauthorized access <input checked="" type="checkbox"/> unauthorized disclosure	
<b>Description of incident</b>	<ul style="list-style-type: none"><li>• The Organization has a job profile builder that members can use to create a job profile.</li></ul>

	<ul style="list-style-type: none"> <li>• Between June 2018 and June 2019, job seekers could either request that a PDF of their job profile be sent by email to themselves or to a potential employer. This is done using a link sent to the job seeker or the potential employer from which a PDF can be downloaded.</li> <li>• During the process for sending the email, the job profile was indexed by the Organization’s search crawler making it available in site searches. However, this also meant that if an individual’s name was typed into the search bar on the Organization’s site or into a search engine that did not respect the Organization’s search engine crawler instructions (Google, Bing and Yahoo abide by the rules), the job profile could have been viewed.</li> <li>• The Organization confirmed no job profiles were downloaded by outside persons or sites.</li> <li>• The incident was discovered on June 11, 2019.</li> </ul>
<b>Affected individuals</b>	The incident affected approximately 186 individuals, including 91 residents of Alberta.
<b>Steps taken to reduce risk of harm to individuals</b>	<ul style="list-style-type: none"> <li>• Corrected the issue and removed the job profiles from the searches.</li> <li>• Alerted affected individuals to the issue.</li> <li>• Now sending job profile as an attachment to emails (instead of the link) that the user opts to send.</li> </ul>
<b>Steps taken to notify individuals of the incident</b>	Affected individuals were notified by email on July 20, 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.	<p>The Organization reported that the information at issue “Could be used in phishing scams as identifiable information is available.”</p> <p>In my view, a reasonable person would consider that the contact, employment and education information at issue is comprehensive enough that it could be used to cause the harms of identity theft and fraud. Email addresses could be used for the purposes of phishing, increasing vulnerability to identity theft and fraud. These are all significant harms.</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>The Organization reported that there is a “Low risk of harm. We know that no PDF’s (sic) were downloaded. However, we do not know if any had been viewed.”</p> <p>In my view, a reasonable person would consider the likelihood of harm is decreased as the incident did not result from malicious intent. However, although the Organization confirmed that no job profiles were downloaded by unauthorized third parties, it does not know whether the job profiles were viewed by unauthorized</p>

	third parties. Further, the information may have been exposed for over 1 (one) year.
<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 contact, employment and education information at issue is comprehensive enough that it could be used to cause the harms of identity theft and fraud. Email addresses could be used for the purposes of phishing, increasing vulnerability to identity theft and fraud. These are all significant harms. The likelihood of harm is decreased as the incident did not result from malicious intent. However, although the Organization confirmed that no job profiles were downloaded by unauthorized third parties, it does not know whether the job profiles were viewed by unauthorized third parties. Further, the information may have been exposed for over 1 (one) year.</p> <p>I require the Organization to notify the affected individuals whose personal information was collected in Alberta, in accordance with section 19.1 of the <i>Personal Information Protection Act Regulation</i> (Regulation).</p> <p>I understand the Organization notified affected individuals by email on July 20, 2019, in accordance with the Regulation. The Organization is not required to notify the affected individuals again.</p>	

Jill Clayton  
Information and Privacy Commissioner