



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	RedBloom Salons (Organization)
Decision number (file number)	P2021-ND-045 (File #18382)
Date notice received by OIPC	October 8, 2020
Date Organization last provided information	October 8, 2020
Date of decision	March 2, 2021
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 whose personal information was collected in Alberta pursuant to section 37.1 of <i>the Personal Information Protection Act</i> (PIPA).
JURISDICTION	
Section 1(1)(i) of PIPA “organization”	The Organization operates in Alberta and is an “organization” as defined in section 1(1)(i) of PIPA.
Section 1(1)(k) of PIPA “personal information”	<p>The incident involved all or some of the following information:</p> <ul style="list-style-type: none">• name,• address,• social insurance number,• banking information, and• benefit information. <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">• Sometime in March/April 2020, the Organization’s storage locker was broken into.• The incident was discovered on August 28, 2020 when police notified the Organization that employee files had been discovered during an operation on June 19, 2020.

	<ul style="list-style-type: none"> When the Organization went to the storage locker, it discovered a box of employee files was missing. On September 16, 2020, police returned the box of files to the Organization.
Affected individuals	The incident affected 54 individuals / residents of Alberta.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> Reported incident to law enforcement. Considering alternative storage options.
Steps taken to notify individuals of the incident	Affected individuals were notified by email on October 8, 2020.
REAL RISK OF SIGNIFICANT HARM ANALYSIS	
<p>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>	<p>The Organization reported that “Banking and credit could be compromised resulting in financial fraud as well as potential identify [sic] theft”.</p> <p>I agree with the Organization’s assessment. A reasonable person would consider the contact, identity, financial and employment information at issue could be used to cause the harms of identity theft and fraud. These are significant harms.</p>
<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>	<p>The Organization reported there is a “Real risk of harm (potential of financial fraud and/or identity (sic) theft)”.</p> <p>I agree with the Organization’s assessment. The likelihood of harm resulting from this incident is increased because the incident resulted from malicious intent (break-in and theft). Although police returned the recovered box of records to the Organization, it was likely exposed for over three months. The Organization did not report if all employee files were recovered or if any were missing.</p>
DECISION UNDER SECTION 37.1(1) OF PIPA	
<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 the contact, identity, financial and employment information at issue could be used to cause the harms of identity theft and fraud. These are significant harms. The likelihood of harm resulting from this incident is increased because the incident resulted from malicious intent (break-in and theft). Although police returned the recovered box of records to the Organization, it was likely exposed for over three months. The Organization did not report if all employee files were recovered or if any were missing.</p>	

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 Organization notified affected individuals in an email on October 8, 2020 in accordance with the Regulation. The Organization is not required to notify the affected individuals again.

Jill Clayton
Information and Privacy Commissioner