



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Warner Music Group Corporation (Organization)
Decision number (file number)	P2021-ND-132 (File #017194)
Date notice received by OIPC	September 8, 2020
Date Organization last provided information	September 8, 2020
Date of decision	May 18, 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 the individuals whose personal information was collected in Alberta, pursuant to section 37.1 of the <i>Personal Information Protection Act</i> (PIPA).
JURISDICTION	
Section 1(1)(i) of PIPA “organization”	The Organization is a music entertainment company that also sells merchandise relating to bands and artists with which it works. The Organization is an “organization” as defined in section 1(1)(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,• email address,• telephone number,• billing address,• shipping address, and• payment card details (card number, CVC/CVV and expiration date). <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 ecommerce website.</p>
DESCRIPTION OF INCIDENT	
<input type="checkbox"/> loss <input checked="" type="checkbox"/> unauthorized access <input type="checkbox"/> unauthorized disclosure	

<p>Description of incident</p>	<ul style="list-style-type: none"> On August 5, 2020, the Organization learned that an unauthorized third party had compromised a number of U.S.-based ecommerce websites that the Organization operates but that are hosted and supported by an external service provider Acquia, Inc. The unauthorized third party potentially acquired a copy of information customers entered on the affected websites after placing an item into their shopping carts. This could have impacted purchases made with credit cards through the affected websites between April 25, 2020 and August 5, 2020.
<p>Affected individuals</p>	<p>The incident affected 524 Alberta residents.</p>
<p>Steps taken to reduce risk of harm to individuals</p>	<ul style="list-style-type: none"> Retained outside cybersecurity experts to assist with its navigation and remediation of the incident; Removed the malware in question from the impacted U.S. ecommerce websites; Reset administrative passwords across all U.S. Acquia supported and hosted ecommerce websites; Reset secret keys used by third party vendors across all U.S. Acquia supported and hosted ecommerce websites; Reset passwords for API users across all U.S. Acquia supported and hosted ecommerce websites; Increased the frequency of malware scanning on the U.S. Acquia supported and hosted ecommerce websites; and Made arrangements for affected individuals to receive a complimentary one-year membership of the Equifax Premier Canada. Notified and cooperating with relevant Canadian privacy regulatory authorities, payment card providers and appropriate law enforcement agencies.
<p>Steps taken to notify individuals of the incident</p>	<p>Affected individuals were notified by email beginning September 4, 2020.</p>
<p>REAL RISK OF SIGNIFICANT HARM ANALYSIS</p>	
<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 did not specifically identify any harm that might result from this incident, but its notification to affected individuals stated:</p> <p style="text-align: center;"><i>We are offering credit monitoring and identity theft protection services through Equifax for 12 months, free of charge. You can find further details below on how to sign-up.</i></p> <p>The Organization provided “Additional Guidance” to affected individuals instructing them to review account statements and</p>

	<p>notify law enforcement of suspicious activity, obtain a copy of their credit report and place a fraud alert on their credit report.</p> <p>In my view, a reasonable person would consider that the contact and financial information at issue could be used to cause the harms of identity theft and fraud. Email addresses could be used for phishing, increasing vulnerability to 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 did not specifically provide an assessment of the likelihood that significant harm would result from this incident.</p> <p>In my view, a reasonable person would consider that the likelihood of harm resulting from this incident is increased because the incident appears to be the result of malicious intent (deliberate action by an unauthorized party). Additionally, the information was exposed for over three (3) months.</p>
<p>DECISION UNDER SECTION 37.1(1) OF PIPA</p>	
<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 and financial information at issue could be used to cause the harms of identity theft and fraud. Email addresses could be used for phishing, increasing vulnerability to identity theft and fraud. These are significant harms.</p> <p>The likelihood of harm resulting from this incident is increased because the incident appears to be the result of malicious intent (deliberate action by an unauthorized party). Additionally, the information was exposed for over three (3) months.</p> <p>I require the Organization to notify the affected individuals whose 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 starting September 4, 2020 in accordance with the Regulation. The Organization is not required to notify the affected individuals again.</p>	

Jill Clayton
Information and Privacy Commissioner