



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Rocky Credit Union Ltd. (Organization)
Decision number (file number)	P2021-ND-170 (File #017958)
Date notice received by OIPC	June 22, 2020
Date Organization last provided information	June 22, 2020
Date of decision	August 27, 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 the <i>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”	The incident involved all or some of the following information: <ul style="list-style-type: none">• name, and• account balance. This information is about identifiable individuals and is “personal information” as defined in section 1(1)(k) of PIPA.
DESCRIPTION OF INCIDENT	
<input type="checkbox"/> loss <input type="checkbox"/> unauthorized access <input checked="" type="checkbox"/> unauthorized disclosure	
Description of incident	<ul style="list-style-type: none">• On June 18, 2020, an employee with the Organization was helping a member who asked for balances on his accounts.• The employee was possibly in the member’s wife’s profile, and gave the balance of a youth’s savings account to the member.• The member is not a signer on the youth’s savings account and therefore should not have had that information.• The breach was discovered the same day, when the member’s wife contacted the Organization to report the error.

Affected individuals	The incident affected 2 individuals.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> • Added messages to the members’ file to verify signers before accessing the account. • Reminded staff to double check signers before going into account information. • Provided training on the banking system to ensure no knowledge gaps.
Steps taken to notify individuals of the incident	The affected individuals were notified verbally on June 18, 2020.

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 “Member’s husband was not aware of the account for the youth, and is now.”</p> <p>In my view, a reasonable person would consider that the contact and account balance, as well as information about an existing bank account could be used to cause the significant harms of financial loss, and potentially stress, hurt, humiliation and embarrassment, or damage to personal relationships.</p>
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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>The Organization reported “After (the) manager spoke with the member, the member was upset, but understanding.”</p> <p>In my view, a reasonable person would consider the likelihood of significant harm resulting from this incident is decreased because it was the result of human error and not malicious intent. Financial loss is unlikely given the circumstances and considering the unintended recipients are known to the Organization. Nonetheless, given the personal relationship between the affected individuals and the unintended recipient, stress, hurt, humiliation and embarrassment, and damage to personal relationships are real risks.</p>
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N 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 and account balance, as well as information about an existing bank account could be used to cause the significant harms of financial loss, and potentially stress, hurt, humiliation and embarrassment, or damage to personal relationships. The likelihood of significant harm resulting from this incident is decreased because it was the result of human error and not malicious intent. Financial loss is unlikely given the circumstances and considering the unintended recipients are known to the Organization. Nonetheless, given the

personal relationship between the affected individuals and the unintended recipient, stress, hurt, humiliation and embarrassment, and damage to personal relationships are real risks.

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 the Organization notified affected individuals verbally on June 18, 2020, in accordance with the Regulation. The Organization is not required to notify the affected individuals again.

Jill Clayton
Information and Privacy Commissioner