



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	SiteOne Landscape Supply, Inc. (Organization)
Decision number (file number)	P2021-ND-192 (File #017914)
Date notice received by OIPC	November 2, 2020
Date Organization last provided information	June 3, 2021
Date of decision	October 14, 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 is headquartered in Roswell, Georgia, USA, 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,• date of birth,• address,• Social Insurance Number,• bank account number, and• routing numbers. <p>This information is about identifiable individuals and is “personal information” as defined in section 1(1)(k) of PIPA. To the extent the personal information was collected in Alberta by the Organization, PIPA applies.</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"> • Between July 2 and July 14, 2020, the Organization’s network was subject to unauthorized access, including the exfiltration of files, by a threat actor. A threat actor gained access to the Organization’s network using the account credentials of an employee. It is unclear how the credentials were compromised. • The incident was discovered on July 14, 2020, when an internal alert notified the Organization that one of its systems was down. • On September 4, 2020, the Organization’s investigation determined that files containing personal information were exfiltrated.
<p>Affected individuals</p>	<p>The incident affected 156 of residents of Alberta.</p>
<p>Steps taken to reduce risk of harm to individuals</p>	<ul style="list-style-type: none"> • Offered identity theft prevention services to impacted individuals. • Implemented enhanced monitoring and alerting software. • Implemented multi-factor authentication.
<p>Steps taken to notify individuals of the incident</p>	<p>Affected individuals were notified by mail on October 30, 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 possible harms that might result from the breach, but reported it is...</p> <p style="text-align: center;"><i>... not aware of any misuse of the personal information that may have been accessed by the unauthorized individual as a result of this incident. To help prevent such harms, [the Organization] provided notification of the incident to individuals whose information may have been involved and provided steps they can take in response. Eligible individuals were offered complimentary memberships to identity theft prevention services through Equifax.</i></p> <p>The Organization’s notifications to individuals stated:</p> <p style="text-align: center;"><i>We recommend you remain vigilant to the possibility of fraud by reviewing your financial account statements for any suspicious activity. You should immediately report any suspicious activity to your financial institution.</i></p> <p style="text-align: center;">...</p> <p style="text-align: center;"><i>Help reduce financial risk. With up to \$50,000 identity theft insurance.</i></p>

	<p>In my view, a reasonable person would consider that the identity, contact, and financial information at issue, including Social Insurance Number, could be used for the purposes of identity theft, fraud, and possibly, financial loss. 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 it "... is not aware of any misuse of the personal information that may have been accessed by the unauthorized individual as a result of this incident. Given this, [the Organization's] assessment is that the likelihood of harm is low."</p> <p>In my view, the likelihood of harm resulting from this incident is increased because the personal information was compromised due to the deliberate action of an unauthorized party. The information appears to have been exposed for almost 2 weeks. The fact there is no evidence that the personal information at issue has been misused to date is not a mitigating factor as harms may occur months, or years, after an incident.</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 identity, contact, and financial information at issue, including Social Insurance Number, could be used for the purposes of identity theft, fraud, and possibly, financial loss. These are significant harms.</p> <p>The likelihood of harm resulting from this incident is increased because the personal information was compromised due to the deliberate action of an unauthorized party. The information appears to have been exposed for almost 2 weeks. The fact there is no evidence that the personal information at issue has been misused to date is not a mitigating factor as harms may occur months, or years, after an incident.</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 in a letter dated October 30, 2020, in accordance with the Regulation. The Organization is not required to notify the affected individuals again.</p>	

Jill Clayton
Information and Privacy Commissioner