



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Vision Credit Union Ltd. (Organization)	
Decision number (file number)	P2021-ND-249 (File #020811)	
Date notice received by OIPC	April 29, 2021	
Date Organization last provided information	April 29, 2021	
Date of decision	December 8, 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 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,• telephone number,• loan number,• mortgage balance,• social insurance number,• date of birth,• all financial information,• net worth, and• income. <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>	
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 December 10, 2020 and March 25, 2021, the Organization forwarded personal information by email to an incorrect email address. The unintended recipient mentioned in a Facebook posting that they had received someone else's information. The Organization reported the breach was discovered on April 23, 2021.
Affected individuals	The incident affected 4 individuals whose information was collected in Alberta.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> Offering credit monitoring to affected members for a year. Completed extra training by all staff regarding email etiquette and caution.
Steps taken to notify individuals of the incident	Affected individuals were notified verbally on April 29, 2021.
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, "This information could be used for identity theft."</p> <p>In my view, a reasonable person would consider that the contact, identity, and financial information at issue could be used to cause the significant harms of identity theft, fraud, and potentially humiliation and embarrassment.</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>The Organization reported, "we do not feel there is any intent of the unintended recipient to harm anyone of the members."</p> <p>In my view, a reasonable person would consider the likelihood of significant harm resulting from this incident is decreased as it did not result from malicious intent. It is not clear, however, if the Organization retrieved the information that was disclosed in error or confirmed that the unintended recipient deleted, destroyed and did not use or distribute the information further. The information was disclosed twice: once in December 2020 and again in March 2021.</p>
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, identity, and financial information at issue could be used to cause the significant harms of identity theft, fraud, and potentially humiliation and embarrassment.	

The likelihood of significant harm resulting from this incident is decreased as it did not result from malicious intent. It is not clear, however, if the Organization retrieved the information that was disclosed in error or confirmed that the unintended recipient deleted, destroyed and did not use or distribute the information further. The information was disclosed twice: once in December 2020 and again in March 2021.

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 April 29, 2021. The Organization is not required to notify the affected individuals again.

Jill Clayton
Information and Privacy Commissioner