



**PERSONAL INFORMATION PROTECTION ACT**  
**Breach Notification Decision**

<b>Organization providing notice under section 34.1 of PIPA</b>	Canalta Real Estate Services o/a Ramada Cochrane (Organization)
<b>Decision number (file number)</b>	P2021-ND-256 (File #021094)
<b>Date notice received by OIPC</b>	March 17, 2021
<b>Date Organization last provided information</b>	November 25, 2021
<b>Date of decision</b>	January 31, 2022
<b>Summary of decision</b>	There is a real risk of significant harm to the individuals affected by this incident. The Organization is required to notify these individuals pursuant to section 37.1 of the <i>Personal Information Protection Act</i> (PIPA).
<b>JURISDICTION</b>	
<b>Section 1(1)(i) of PIPA “organization”</b>	The Organization operates in Alberta and is an “organization” as defined in section 1(1)(i) of PIPA.
<b>Section 1(1)(k) of PIPA “personal information”</b>	<p>The incident involved all or some of the following information:</p> <ul style="list-style-type: none"><li>• name,</li><li>• address,</li><li>• telephone number, and</li><li>• credit card information.</li></ul> <p>This information is about identifiable individuals and is “personal information” as defined in section 1(1)(k) of PIPA.</p>
<b>DESCRIPTION OF INCIDENT</b>	
<input checked="" type="checkbox"/> loss <input type="checkbox"/> unauthorized access <input type="checkbox"/> unauthorized disclosure	
<b>Description of incident</b>	<ul style="list-style-type: none"><li>• On February 28, 2021, a storage shed belonging to the Organization was broken into.</li><li>• The break-in was discovered on March 1, 2021, and reported to the RCMP. At the time, only recyclables were noticed to have been stolen.</li></ul>

	<ul style="list-style-type: none"> <li>On March 15, 2021, the local police service contacted the Organization and advised they discovered 17 hotel documents containing personal information at a motel in the Calgary area.</li> </ul>
<b>Affected individuals</b>	The incident affected approximately 17 individuals.
<b>Steps taken to reduce risk of harm to individuals</b>	<ul style="list-style-type: none"> <li>Advised affected individuals to contact credit card companies in order to monitor or cancel cards.</li> <li>Moved all documents to a locked and secured interior storage room.</li> <li>Will store credit card authorization forms in a locked filing cabinet and shred after 30 days.</li> </ul>
<b>Steps taken to notify individuals of the incident</b>	The affected individuals were notified by telephone on March 17, 2021.
<b>REAL RISK OF SIGNIFICANT HARM ANALYSIS</b>	
<p><b>Harm</b> 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 the possible harms that may result from the breach are “Financial fraud, identity theft.”</p> <p>I agree with the Organization’s assessment. A reasonable person would consider that the contact and financial information at issue could be used to cause the significant harms of identity theft, fraud, and financial loss.</p>
<p><b>Real Risk</b> 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, “Some individuals contacted had reported fraudulent charges. Harm is highly likely.”</p> <p>In my view, a reasonable person would consider that the likelihood of harm resulting from this incident is increased, as it was the result of malicious intent (break-in and theft). In addition, the Organization reported that some affected individuals reported that they were victims of fraudulent charges on their credit cards.</p>
<b>DECISION UNDER SECTION 37.1(1) OF PIPA</b>	
<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 significant harms of identity theft, fraud, and financial loss. The likelihood of harm resulting from this incident is increased, as it was the result of malicious intent (break-in and theft). In addition, the Organization reported that some affected individuals reported that they were victims of fraudulent charges on their credit cards.</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 affected individuals were notified by telephone on March 17, 2021, in accordance with the Regulation. The Organization is not required to notify the individuals again.

Jill Clayton  
Information and Privacy Commissioner