



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Home Financing Solutions Inc. (Organization)
Decision number (file number)	P2021-ND-328 (File #023173)
Date notice received by OIPC	September 8, 2021
Date Organization last provided information	September 8, 2021
Date of decision	March 9, 2022
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 located in Calgary, Alberta, 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,• physical address,• mortgage application,• credit report,• sources of credit (loans, credit cards, etc.), and• social insurance number. <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, PIPA applies.</p>
DESCRIPTION OF INCIDENT	
<input type="checkbox"/> loss <input checked="" type="checkbox"/> unauthorized access <input type="checkbox"/> unauthorized disclosure	

Description of incident	<ul style="list-style-type: none"> • The Organization uses a mortgage application and processing system, Velocity, from the vendor Newton. • Between August 14 and 31, 2021, an unauthorized actor gained access to Velocity. They accessed former clients' mortgage applications and were able to obtain copies of applicants' credit reports. • The Organization became "fully aware" "of a security breach" on or about September 2, 2021, when an affected individual was alerted to an enquiry on their Equifax account; the individual notified the Organization that they were not applying for credit and that the enquiry was fraudulent.
Affected individuals	<p>The incident affected 50 individuals, including 45 whose information was collected in Alberta.</p>
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> • Recommended that affected individuals contact their credit bureaus and implement fraud/identity alerts on their files. • Worked with the vendor to nullify access credentials. • Blocked the unauthorized actor's IP address. • Notified law enforcement.
Steps taken to notify individuals of the incident	<p>Affected individuals were notified by email on September 7, 2021.</p>
REAL RISK OF SIGNIFICANT HARM ANALYSIS	
Harm <p>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 the possible harms of "Identity theft [sic], fraudulent credit applications, etc".</p> <p>I accept the Organization's assessment. A reasonable person would consider that the identity (name, date of birth, social insurance number), contact (address), and financial (mortgage application, credit report) information at issue could be used to cause the harms of identity theft, fraud, and negative affects on a credit record. Information on a credit report could also be used to cause the harms of embarrassment or humiliation. These are significant harms.</p>
Real Risk <p>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 assessed that the likelihood of harm is "very high".</p> <p>I accept the Organization's assessment. A reasonable person would consider that the likelihood of harm resulting from this incident is increased because the personal information was compromised due to the malicious action of an unauthorized third party (deliberate intrusion and fraudulently obtaining credit records). The information may have been exposed for</p>

	approximately a month before individuals were notified of the breach and advised to be vigilant against possible harms.
DECISION UNDER SECTION 37.1(1) OF PIPA	
<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 (name, date of birth, social insurance number), contact (address), and financial (mortgage application, credit report) information at issue could be used to cause the harms of identity theft, fraud, and negative affects on a credit record. Information on a credit report could also be used to cause the harms of embarrassment or humiliation. 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 malicious action of an unauthorized third party (deliberate intrusion and fraudulently obtaining credit records). The information may have been exposed for approximately a month before individuals were notified of the breach and advised to be vigilant against possible harms.</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 by email on September 7, 2021, in accordance with the Regulation. The Organization is not required to notify the affected individuals again.</p>	

Jill Clayton
Information and Privacy Commissioner