



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Olymel LP (Organization)
Decision number (file number)	P2021-ND-340 (File #022624)
Date notice received by OIPC	August 5, 2021
Date Organization last provided information	October 1, 2021
Date of decision	March 10, 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 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,• telephone number,• address,• social insurance number,• date of birth,• marital status,• gender,• bank account number,• salary, and• pension plan information. <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 is a subsidiary of the “Sollio Cooperative Group” (Sollio). • On November 7, 2020, Sollio suffered a ransomware attack. Sollio’s analysis of the incident determined that the threat actor first gained access to its systems on November 2, 2020. • On December 4, 2020, Sollio notified the Organization that personal information about its employees may have been impacted. This was confirmed on May 12, 2021. • It is reported that the threat actor published the exfiltrated records at some point during the incident. However, the threat actor removed and deleted the records at Sollio’s request.
Affected individuals	The incident affected 2,245 residents of Alberta.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> • Offered credit monitoring and identity theft and fraud insurance to affected individuals. • Notified law enforcement. • Retained expertise to manage and investigate the incident. • Implemented measures to improve its cybersecurity program.
Steps taken to notify individuals of the incident	Affected individuals are being notified by letter between October 1 and 6, 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.	The Organization reported: <i>Given the nature of the potentially compromised information, possible harm(s) include financial fraud or identity theft.</i> I accept the Organization’s assessment. A reasonable person would consider that the contact, identity (social insurance number, date of birth), financial, and employment information could be used to cause the harms of identity theft and fraud. These are significant harms.

<p>Real Risk</p> <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 reported:</p> <p style="text-align: center;"><i>The likeliness that such harm will occur will be significantly reduced as a result of the implementation of the credit monitoring services and the offer of insurance against identity theft and fraud.</i></p> <p>In my view, the likelihood of harm resulting from this incident is increased because the personal information was compromised due to the malicious action of a third party (deliberate intrusion, ransomware). The threat actor also published the personal information on the internet for a period of time, prior to being removed and deleted at Sollio's request. Despite this, it is unclear whether the threat actor created copies of the records before destroying them.</p>
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 contact, identity (social insurance number, date of birth), financial, and employment information could be used to cause the harms of identity theft and fraud. 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 a third party (deliberate intrusion, ransomware). The threat actor also published the personal information on the internet for a period of time, prior to being removed and deleted at Sollio's request. Despite this, it is unclear whether the threat actor created copies of the records before destroying them.</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 is notifying affected individuals by letter between October 1 and 6, 2021 in accordance with the Regulation. The Organization is not required to notify the affected individuals again.</p>	

Jill Clayton
Information and Privacy Commissioner