



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

<b>Organization providing notice under section 34.1 of PIPA</b>	Wycliffe Bible Translators of Canada Inc. (Organization)
<b>Decision number (file number)</b>	P2022-ND-022 (File #022286)
<b>Date notice received by OIPC</b>	April 29, 2021
<b>Date Organization last provided information</b>	April 29, 2021
<b>Date of decision</b>	April 25, 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 those individuals whose personal information was collected in Alberta, 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 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>• mailing address,</li><li>• amount donated to a project during the week of December 29, 2020 - January 4, 2021,</li><li>• donor number and</li><li>• method of donation (i.e., whether by Visa, MC, cheque, or bank transfer).</li></ul> <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> <p>The Organization reported, "Other than the method of donation, no other payment card or banking information was disclosed."</p>
<b>DESCRIPTION OF INCIDENT</b>	
<input type="checkbox"/> loss <input type="checkbox"/> unauthorized access <input checked="" type="checkbox"/> unauthorized disclosure	

<b>Description of incident</b>	<ul style="list-style-type: none"> <li>On January 7, 2021, a donor report with personal information was accidentally sent to an incorrect email address belonging to an unknown user due to a clerical error.</li> <li>The Organization attempted to contact the unintended recipient's email address, notifying them of the error, and asking them to delete the January 7, 2021 email, which was sent in error. The Organization has not received a response from the unintended recipient.</li> </ul>
<b>Affected individuals</b>	The incident affected 21 individuals, including 10 whose information was collected in Alberta.
<b>Steps taken to reduce risk of harm to individuals</b>	<ul style="list-style-type: none"> <li>Encouraged individuals to "always be vigilant with respect to any suspicious activity involving your personal information or accounts, and to report any concerns to police."</li> <li>Sent reminder to all staff about email security requirements, with specific instructions that transmitting information by personal email is not permitted.</li> <li>Provided email security training at staff meeting.</li> </ul>
<b>Steps taken to notify individuals of the incident</b>	Affected individuals were notified by letter or email on April 12, 2021.
<b>REAL RISK OF SIGNIFICANT HARM ANALYSIS</b>	
<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.	The Organization reported,  <i>The name, mailing address and donation information could be used for the purposes of phishing, increasing the affected individuals' vulnerability to identity theft and fraud.</i>  I agree with the Organization's assessment. The contact and donation information, along with the email address could be used for the purposes of phishing, which increases the affected individuals' vulnerability to identity theft and fraud.
<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.	The Organization reported,  <i>The unauthorized disclosure was caused by human error, and was not the result of a malicious attacker. This lowers the risk of harm.</i>  <i>Wycliffe Canada has not been able to obtain confirmation from the unintended recipient that the email was deleted and not copied, forwarded or otherwise distributed. This increases the risk of harm.</i>  I agree with the Organization's assessment. A reasonable person would consider the likelihood of significant harm resulting from this incident is decreased, as it did not result from malicious intent.

	<p>However, the Organization was not able to contact the unintended recipient to confirm the personal information was deleted, destroyed, not used or forwarded or otherwise distributed, which increases the risk of harm to the affected individuals.</p>
<p><b>DECISION UNDER SECTION 37.1(1) OF PIPA</b></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>The contact and donation information, along with the email address could be used for the purposes of phishing, which increases the affected individuals' vulnerability to identity theft and fraud.</p> <p>The likelihood of significant harm resulting from this incident is decreased, as it did not result from malicious intent. However, the Organization was not able to contact the unintended recipient to confirm the personal information was deleted, destroyed, not used or forwarded or otherwise distributed, which increases the risk of harm to the affected individuals.</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 letter or email on April 12, 2021. The Organization is not required to notify the affected individuals again.</p>	

Cara-Lynn Stelmack  
Assistant Information and Privacy Commissioner