

PIPA Privacy Breach Notification Form

**This form is to be used by an organization that is notifying the Information and Privacy Commissioner (the Commissioner) of a privacy breach under section 34.1 of the *Personal Information Protection Act* (PIPA**).

A “privacy breach” or “breach” means the loss of or unauthorized access to or disclosure of personal information where a reasonable person would consider that there exists a real risk of significant harm to an individual as a result of the loss or unauthorized access or disclosure.

Notice to the Commissioner must be in writing and include the information listed in section 19 of the *PIPA Regulation*.

**Before completing this form, please read the** [***Guidance for Notifying the Commissioner about a Privacy Breach under PIPA***](https://oipc.ab.ca/wp-content/uploads/2024/04/Guidance-for-Notifying-the-OIPC-about-a-Privacy-Breach-Under-PIPA-April-2024.pdf)**, and the** [***OIPC PIPA Privacy Breach Process***](https://oipc.ab.ca/wp-content/uploads/2024/04/PIPA-Privacy-Breach-Process-April-2024.pdf)**, available on the OIPC website.**

**Please Note: Individuals (members of the public) should not use this form.** Individuals who believe their personal information has been lost or improperly collected, used, disclosed, or accessed by an organization may file a complaint with the Office of the Information and Privacy Commissioner of Alberta (“OIPC”) using the[*Request for Review and Privacy Complaint Form*](https://oipc.ab.ca/request-a-review-file-a-complaint/).

Custodians as defined in the *Health Information Act* (HIA) notifying the Commissioner of a breach have different notification obligations, and must use the appropriate form available on the OIPC website [here](https://oipc.ab.ca/forms/), under the heading Mandatory and Self-Reported Breach Forms.

|  |
| --- |
| **Section A: Information of Organization** |
|  |

|  |  |  |  |
| --- | --- | --- | --- |
| **Date of Notification:** | | |  |
| **Name of Organization** (legal name): | | |  |
| **Address of Organization:** | | |  |
| **Organization File Number** (if applicable): | | |  |
| **Description of Organization** (what the Organization does): | | |  |
| **Organization Classification** (North American Industry Classification System (NAICS)): | | | **Select Classification.** |
| **Contact information for a person who can answer the OIPC’s questions about the breach.** | | | |
|  | Name: |  | |
|  | Title/Position: |  | |
|  | Mailing address: |  | |
|  | Telephone: |  | |
|  | Email: |  | |
|  | Fax: |  | |

|  |
| --- |
| **PIPA non-profit organizations:** Is the organization incorporated under the *Societies Act* or the *Agricultural Societies Act,* orregistered under Part 9 of the *Companies Act* of Alberta?  **Yes or no.** |
| If yes, indicate which of the *Societies Act, Agricultural Societies Act* or *Companies Act* the organization was incorporated or registered under and describe the type of activities the organization is engaged in that relate to the personal information that has been breached: |

|  |  |  |  |
| --- | --- | --- | --- |
| **Third party notifying the Commissioner about the breach** (if applicable) | | | |
|  | Name of entity: |  | |
|  | Mailing address: |  | |
|  | Contact person (name and position): |  | |
|  | Mailing address: |  | |
|  | Telephone number: |  | |
|  | Email: |  | |
|  | Fax: |  | |
| Relationship to the organization (e.g. service provider, contractor): | | |  |
| Has the organization been notified of the breach? | | | **Yes, no, or not applicable.** |
| Is the entity authorized to notify the Commissioner on behalf of the organization? | | | **Yes, no, or not applicable.** |

|  |
| --- |
| **Section B: Breach Description** |
|  |

|  |  |  |  |
| --- | --- | --- | --- |
| 1. | **Date breach occurred:** | |  |
| 2. | **Date breach was discovered:** | |  |
| 3. | **Date breach ended:** | |  |
| 4. | **Total number of individuals affected** (or estimate if not yet known): | |  |
| 5. | **Was the information collected in Alberta?** | | **Yes or no.** |
|  | If yes, the number of individuals whose information  was collected in Alberta (or estimate if not yet known): | |  |
| 6. | **The breach involved** (select all that apply)**:** | | |
|  |  | Loss or theft of personal information. | |
|  |  | Unauthorized access to personal information. | |
|  |  | Unauthorized disclosure of personal information. | |
| 7. | **Location of the breach:** | | |
| 8. | **Describe the circumstances of the breach including cause, how it was discovered, and by whom.** ***Do not include individually identifying information****.* | | |

|  |
| --- |
| **Personal Information Involved** |
|  |

|  |  |  |  |
| --- | --- | --- | --- |
| 9. | **Identify the types of personal information and list the data elements involved.**  Select the affected categories of personal information: | | |
|  |  | **Select category.** | **Select category.** |
|  |  | **Select category.** | **Select category.** |
|  |  | **Select category.** | **Select category.** |
|  |  | **Select category.** | **Select category.** |
|  | Additional categories or unknown/other (describe): | | |
|  | List each specific data element involved. ***Do not include individually identifying information****.*  (e.g. Identity information including age, date of birth, copy of passport, signature, birth certificate, and Social Insurance Number; Contact information including email address, home address, and telephone number): | | |

|  |
| --- |
| **Section C: Significant Harm** |
|  |

|  |  |
| --- | --- |
| 10. | **Describe the significant harm (damage, detriment, or injury) that may occur to the affected individual(s) as a result of the privacy breach**.  Harm must be “significant.” The harm must be important, meaningful, and with non-trivial consequences or effects (e.g. Identity and financial information could be used to cause the harms of identity theft, fraud, and financial loss). |

|  |
| --- |
| **Real Risk of Significant Harm** |
|  |

|  |  |  |  |
| --- | --- | --- | --- |
| 11. | **Describe the Organization’s assessment that a real risk of significant harm exists as a result of the privacy breach.**  Whether real risk of significant harm exists must be more than mere speculation or conjecture. There must be a cause and effect relationship between the breach and the harm. | | |
|  | Risk Factor(s): | **Select option.** | **Select option.** |
|  |  | **Select option.** | **Select option.** |
|  | Additional categories or unknown/other (describe):  Assessment: (e.g. The likelihood of harm resulting from this incident is increased because the personal information was compromised due to the malicious action of a threat actor). | | |
|  |  | | |

|  |
| --- |
| **Risk Mitigation** |
|  |

|  |  |
| --- | --- |
| 12. | **Describe the steps taken to reduce the risk of significant harm to affected individual(s).** |
| 13. | **Describe the steps taken to reduce the risk of a similar event occurring in the future.** |

|  |
| --- |
| **Section D: Notice to Affected Individuals** |
|  |

|  |  |
| --- | --- |
| 14. | **Have affected individuals been notified directly pursuant to PIPA Regulation section 19.1?** |
|  | **Yes, no, or in progress.** |
|  | **Attach a copy of the notice. If notice was given verbally, attach a copy of the script.  *Do not include individually identifying information.***  Describe the content of the notice (contents must meet the requirements of PIPA Regulation s. 19.1(1)): |
| Form of notice: **Written or verbal.** |
| Other: |
| Date when affected individuals were notified: |
| **Notice must be given to individual(s) directly (PIPA Regulation 19.1(1)(a)).** If the organization believes direct notification is unreasonable in this circumstance, provide an explanation and propose a plan for notifying affected individuals indirectly (PIPA Regulation 19.1(2)) for the Commissioner’s consideration: |

|  |
| --- |
| **Section E: Provide any Additional Relevant Information Regarding the Privacy Breach** |
|  |

|  |  |
| --- | --- |
| 15. | **Have the police, other authorities, other privacy regulators, or organizations been notified of the breach?** |
|  | If so, provide the name and contact information for each entity notified, and the date notified. |
|  |  |
|  |  |
|  |  |
| 16. | Add any additional relevant information here. |

|  |
| --- |
| **Submitting to the Commissioner** |
|  |

Organizations are required to notify the Commissioner about a privacy breach under the *Personal Information Protection Act* **without unreasonable delay**.

**Email submissions are preferred. Please submit the completed PIPA Privacy Breach Notification Form to** [**breachnotice@oipc.ab.ca**](mailto:breachnotice@oipc.ab.ca)**.**

If you are unable to submit the form by email, you can submit it to:

Office of the Information and Privacy Commissioner of Alberta

410, 9925 - 109 Street

Edmonton, AB T5K 2J8

Fax: (780) 422-5682

For general information about responding to a privacy breach, please contact the OIPC by telephone at (780) 422-6860, toll free at 1-888-878-4044, or by email at [breachnotice@oipc.ab.ca](mailto:breachnotice@oipc.ab.ca). Contacting the OIPC does not mean that an organization has fulfilled its legal obligation to notify the Commissioner about a privacy breach. Notification to the Commissioner about a privacy breach must meet the requirements of section 19 of the *PIPA Regulation.* Information provided by the OIPC does not constitute legal advice and is not binding on the Commissioner.