



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Connect First Credit Union Ltd. (Organization)
Decision number (file number)	P2021-ND-012 (File #016440)
Date notice received by OIPC	September 3, 2019
Date Organization last provided information	September 27, 2021
Date of decision	February 15, 2021
Summary of decision	There is a real risk of significant harm to the individuals affected by this incident. The Organization is required to notify the individuals pursuant to section 37.1 of the <i>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">• member number,• branch,• contract,• deposit sub number,• investment type,• beginning balance,• interest at maturity,• maturing term,• new investment amount, and• maturity date. <p>The Organization reported, “No personal identifiable information is exposed.” However, because it is associated with member number, this information at issue is about identifiable individuals and is “personal information” as defined in section 1(1)(k) of PIPA.</p>
DESCRIPTION OF INCIDENT	
<input type="checkbox"/> loss <input type="checkbox"/> unauthorized access <input checked="" type="checkbox"/> unauthorized disclosure	

<p>Description of incident</p>	<ul style="list-style-type: none"> On July 15, 2019, the Organization mailed Financial Investment renewal notices to 2,118 members. Page 1 of the notice was addressed to and received by the correct individual; however, page 2 of the notice contained investment information for another member. The incident resulted from an error on the part of a third party vendor used by the Organization for printing and mailing. The error was discovered on July 18, 2019 when a member contacted the Organization stating that the renewal did not have correct account information.
<p>Affected individuals</p>	<p>The incident affected 2,118 residents of Alberta.</p>
<p>Steps taken to reduce risk of harm to individuals</p>	<ul style="list-style-type: none"> Requested members return the incorrect investment renewal notices to one of the Organization’s locations. If the unintended recipients are not able to return the paper copy, the Organization asked recipients to confirm they shredded the document. Not all unintended recipients returned or shred the incorrect investment renewal. All impacted members received a letter with an accurate investment renewal notice. The credit union ended the relationship with the third party vendor and retained a new third party vendor for printing and mailing services.
<p>Steps taken to notify individuals of the incident</p>	<p>Affected individuals were notified by letter on July 22, 2019.</p>
<p>REAL RISK OF SIGNIFICANT HARM ANALYSIS</p>	
<p>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.</p>	<p>The Organization reported, “No harm can be caused to an individual with the exposed information.”</p> <p>In my view, a reasonable person would consider that the identity (member number) and financial information at issue could be used to cause the significant harms of identity theft, fraud, or financial loss.</p>
<p>Real Risk 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, “No harm can be caused to the individual. The harm is the confidence the member has in the credit union.”</p> <p>In my view, a reasonable person would consider that although the unauthorized disclosure was caused by human error and the renewal notices were accidentally sent to unauthorized but known recipients, the likelihood of harm resulting from this incident is</p>

	increased because the Organization could not confirm that all unintended recipients returned or shredded the documentation.
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 (member number) and financial information at issue could be used to cause the significant harms of identity theft, fraud, or financial loss. Although the unauthorized disclosure was caused by human error and the renewal notices were accidentally sent to unauthorized but known recipients, the likelihood of harm resulting from this incident is increased because the Organization could not confirm that all unintended recipients returned or shredded the documentation.</p> <p>I require the Organization to notify the affected individuals in accordance with section 19.1 of the <i>Personal Information Protection Act Regulation</i> (Regulation).</p> <p>I understand the Organization notified the affected individuals by letter on July 22, 2019. The Organization is not required to notify the affected individuals again.</p>	

Jill Clayton
Information and Privacy Commissioner