



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Trans Union of Canada Inc. (Organization)
Decision number (file number)	P2021-ND-051 (File #013251)
Date notice received by OIPC	September 19, 2019
Date Organization last provided information	October 3, 2019
Date of decision	March 2, 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 whose personal information was collected in Alberta, 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">• name,• mailing address,• date of birth,• telephone number,• details relating to the individual's available credit and related payments, and• social insurance number (SIN). <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>
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 operates a portal that enables businesses to access consumer credit files for the purposes of assisting them in adjudicating credit applications.

	<ul style="list-style-type: none"> On August 19, 2019, the Organization determined that the user credentials for one of its corporate customers had been compromised. The corporate customer confirmed to the Organization that its credentials were used without authorization to access consumer credit files. As a result, an unidentified intruder was able to provide sufficiently detailed and up-to-date personal information on a significant number of individuals (including accurate Social Insurance Numbers) in order to access their files. The Organization believes the intruder had access to up-to-date personal information obtained from an unknown third-party source. The unauthorized accesses occurred between June 28, 2019 and July 11, 2019.
Affected individuals	The incident affected 4,037 individuals residing in Alberta.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> Restricted access to the portal platform. Implemented alerts in the event of an increase in the velocity with which credit reports are requested. Examining ways to enhance safeguards to help combat any further credential misuse. Enhancing training and awareness. Providing free credit monitoring services. Customers can also place alerts of their credit file.
Steps taken to notify individuals of the incident	Affected individuals were notified by letter between the week of September 23, 2019 and October 2, 2019.
REAL RISK OF SIGNIFICANT HARM ANALYSIS	
<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 did not specifically identify any harm that might result from this incident, but its notification to affected individuals said “We want you to be aware of and have the tools to help protect your identity, which we will be providing to you, free of charge, including ID theft insurance...”.</p> <p>In my view, a reasonable person would consider that the contact, identity and financial information at issue could be used to cause the significant harms of identity theft and fraud.</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</p>	<p>The Organization did not specifically provide its assessment of the likelihood that significant harm would result from this incident.</p> <p>In my view, a reasonable person would consider the likelihood of harm resulting from this incident is increased because the personal information was compromised due to the malicious action of an</p>

between the incident and the possible harm.	unknown third party (deliberate intrusion). Further, the information may have been exposed for approximately two weeks.
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 resulting from this incident.</p> <p>A reasonable person would consider that the contact, identity and financial information at issue could be used to cause the significant harms of identity theft and fraud. The likelihood of harm resulting from this incident is increased because the personal information was compromised due to the malicious action of an unknown third party (deliberate intrusion). Further, the information may have been exposed for approximately two weeks.</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 the affected individuals by letter between the week of September 23, 2019 and October 2, 2019. The Organization is not required to notify the affected individuals again.</p>	

Jill Clayton
Information and Privacy Commissioner