



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Servus Credit Union Ltd. (Organization)
Decision number (file number)	P2021-ND-008 (File #017043)
Date notice received by OIPC	February 28, 2020
Date Organization last provided information	March 9, 2021
Date of decision	March 31, 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 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,• address, and• social insurance number. <p>This information is about identifiable individuals and is “personal information” as defined in section 1(1)(k) of PIPA. The personal information was collected in Alberta.</p>
DESCRIPTION OF INCIDENT	
<input type="checkbox"/> loss <input type="checkbox"/> unauthorized access <input checked="" type="checkbox"/> unauthorized disclosure	
Description of incident	<p>An error in the printing and folding of tax receipts resulted in social insurance numbers being visible in the address window of mail sent to individuals on February 10, 2020. The Organization was notified by a recipient on February 16, 2020.</p> <p>On February 19, 2021, the Organization determined that 262 notification letters were not delivered as expected in February or</p>

	March of 2020. It was indicated that the error was due to miscommunication and remote work arrangements resulting from the COVID-19 pandemic.
Affected individuals	The incident affected 431 individuals.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> • Offered affected individuals two years of credit monitoring services at no cost. • Implemented additional controls to ensure documents are printed correctly. • Implemented a visual check of mail prior to sending. • Reviewing breach notification procedures to prevent notice delivery errors from reoccurring.
Steps taken to notify individuals of the incident	The Organization notified 169 individuals on February 28, 2020; another 262 impacted individuals were notified on March 5, 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.	<p>The Organization reported that “there is the possibility for identity theft and fraud”.</p> <p>I agree with the Organization’s assessment. A reasonable person would consider the contact and identity (name, address, and SIN) information at issue could be used to cause the harms of identity theft and fraud. These are significant harms.</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>The Organization reported:</p> <p style="text-align: center;"><i>Given the sensitivity of the information, we have determined that there is the possibility for harm as there is the ability for any intermediary to copy information; however, as the documents passed from the organization to Canada Post to the recipient, we’ve assessed the likelihood of harm to be low.</i></p> <p>In my view, a reasonable person would consider the likelihood of harm from this incident is reduced as the personal information was compromised due to human error. However, it is not clear whether the personal information was viewed, copied, or redistributed. Further, the information may have been exposed for the duration between leaving the Organization and being received by the individuals.</p>

DECISION UNDER SECTION 37.1(1) OF PIPA

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.

A reasonable person would consider the contact and identity (name, address, and SIN) information at issue could be used to cause the harms of identity theft and fraud. These are significant harms.

The likelihood of harm from this incident is reduced as the personal information was compromised due to human error. However, it is not clear whether the personal information was viewed, copied, or redistributed. Further, the information may have been exposed for the duration between leaving the Organization and being received by the individuals.

I require the Organization to notify the affected individuals whose personal information was collected in Alberta in accordance with section 19.1 of the *Personal Information Protection Act Regulation* (Regulation).

I understand the Organization notified affected individuals by letter on February 28, 2020 and March 5, 2021, in accordance with the Regulation. The Organization is not required to notify the affected individuals again.

Jill Clayton
Information and Privacy Commissioner