



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	MediaQMI Inc. (Organization)
Decision number (file number)	P2019-ND-035 (File #006507)
Date notice received by OIPC	September 12, 2017
Date Organization last provided information	May 31, 2018
Date of decision	February 19, 2019
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 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,• email address,• mailing address,• telephone number,• username,• password,• date of birth, and• mother’s maiden name. <p>This information is about identifiable individuals and is “personal information” as defined in section 1(1)(k) of PIPA. The information was collected via the Organization’s website. To the extent the personal information was collected in Alberta, PIPA applies in this matter.</p>
DESCRIPTION OF INCIDENT	
<input type="checkbox"/> loss <input checked="" type="checkbox"/> unauthorized access <input type="checkbox"/> unauthorized disclosure	

<p>Description of incident</p>	<ul style="list-style-type: none"> • Prior to April 2015, the Organization operated both the English and French Canoe websites. The English Canoe website was sold to Postmedia in April 2015. Since April 2015, the Organization has operated the French Canoe website; Postmedia operates the English Canoe website. • On September 2, 2017, Postmedia informed the Organization that it had received an extortion demand from an individual who obtained access to personal information relating to the Canoe website. • The Organization investigated, and concluded that in August 2017 an unauthorized individual illegally obtained access to certain archived information held by the Organization relating to an estimated one million individuals who used the website from 1996 to 2008. The archived information related to the Organization’s operation of the English and French websites prior to the 2015 sale to Postmedia. • No financial data was impacted and there is no evidence that information from any other time period was affected. • The Organization did not pay the extortion demand.
<p>Affected individuals</p>	<p>The incident affected approximately 19,000 Albertans.</p>
<p>Steps taken to reduce risk of harm to individuals</p>	<ul style="list-style-type: none"> • Investigated to determine the nature and scope of the compromise and worked with Postmedia and third-party forensic security investigators. • Working with cyber-security experts to put in place measures to help prevent this type of incident from happening again. • Reported the incident to the RCMP.
<p>Steps taken to notify individuals of the incident</p>	<p>Affected individuals were notified in writing starting on September 13, 2017.</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 that “...there is the potential that the email contact information could be used in a phishing campaign and a more remote risk that date of birth and mothers’ maiden name information might be used in relation to attempted identity theft or fraud.” The Organization also said that “Notices to individuals will include information about the incident and steps that individuals can take to protect their information, including remaining vigilant regarding potential phishing emails, particularly ones that may purport to come from Canoe.”</p> <p>I agree with the Organization’s assessment. In my view, a reasonable person would consider that the contact information and email addresses, particularly when associated with users of Canoe and identity information (date of birth), could be used to send</p>

	<p>unsolicited mail, emails and for phishing purposes, resulting in an increased vulnerability to identity theft and fraud. Credentials (username, password) and mother’s maiden name could be used to compromise other online accounts. These are all significant harms.</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 that... “Given the historical and relatively non-sensitive nature of the information, Canoe does not consider that there is a real risk of significant harm to individuals associated with the incident.”</p> <p>In my view, a reasonable person would consider that 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 and extortion demand) and because of the large number of individuals involved. Further, the information may have been exposed for approximately one month.</p>
<p>DECISION UNDER SECTION 37.1(1) OF PIPA</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>A reasonable person would consider that the contact information and email addresses, particularly when associated with users of Canoe and identity information (date of birth), could be used to send unsolicited mail, emails and for phishing purposes, resulting in an increased vulnerability to identity theft and fraud. Credentials (username, password) and mother’s maiden name could be used to compromise other online accounts. These are all significant harms.</p> <p>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 and extortion demand) and because of the large number of individuals involved. Further, the information may have been exposed for approximately one month.</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 in writing in accordance with the Regulation starting on September 13, 2017. The Organization is not required to notify the affected individuals again.</p>	

Jill Clayton
Information and Privacy Commissioner