



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Auburn University (Organization)
Decision number (file number)	P2014-ND-10 (File #P2415)
Date notice received by OIPC	August 13, 2013
Date Organization last provided information	January 17, 2014
Date of decision	September 19, 2014
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 pursuant to section 37.1 of the <i>Personal Information Protection Act</i> (PIPA).
JURISDICTION	
Section 1(1)(i) of PIPA “organization”	<p>The Organization is incorporated in the state of Alabama, U.S.A. The information at issue was collected in Alberta.</p> <p>I have jurisdiction because the Organization is an “organization” as defined in section 1(1)(i)(i) of PIPA</p>
Section 1(1)(k) of PIPA “personal information”	<p>The incident involved all or some of the following information about the affected individual:</p> <ul style="list-style-type: none">• demographic information such as name, Social Insurance Number, home address, email address, and telephone number.• information about enrolment as a student, such as first year and graduation year, school attended and alumnus status <p>This information is “personal information” as defined in section 1(1)(k) of PIPA and 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	A spreadsheet containing the above information was inadvertently uploaded to a publicly-accessible Auburn University server.
Affected individuals	<ul style="list-style-type: none"> • In total, 2 122 individuals were affected. • One individual was an Alberta resident.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> • Spreadsheet was removed from the server. • Reported the incident to the Office of the Information and Privacy Commissioner of Alberta.
Steps taken to notify individuals of the incident	<ul style="list-style-type: none"> • Notification sent by mail on August 1, 2013.
REAL RISK OF SIGNIFICANT HARM ANALYSIS	
<p>Harm Some damage or detriment or injury that could be caused to the 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 recognized the affected individuals may be at risk for identity theft and fraud.</p> <p>In my view, the personal information involved is highly sensitive. It contains name, home address and Social Insurance Number. The types of harm that could result from unauthorized access to the personal information in this instance are identity theft and fraud. In my view, these are 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 (due to the sensitivity of the personal information involved), it considered there to be a real risk of significant harm to the affected individuals.</p> <p>In my view, the likelihood of harm resulting from this incident is increased because the personal information was widely accessible on the internet and any copies thereof obtained by third parties through the internet cannot be recovered.</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. The personal information involves sensitive identity information, such as Social Insurance Number, and contact information. The information was widely accessible on the internet and any copies thereof obtained by third parties through the internet cannot be recovered. These factors contributed significantly to my decision.

I require the Organization to notify the affected individuals in accordance with section 19.1 of the *Personal Information Protection Act Regulation* (Regulation).

I understand the Organization notified the affected individuals in a letter dated August 1, 2013, in accordance with the Regulation. The Organization is, therefore, not required to notify the affected individuals again.

Jill Clayton
Information and Privacy Commissioner