



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	SRI Incorporated (Organization)
Decision number (file number)	P2016-ND-07 (File #000633)
Date notice received by OIPC	April 8, 2015
Date Organization last provided information	April 13, 2015
Date of decision	February 9, 2016
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”	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 the following information:</p> <ul style="list-style-type: none">• name,• address,• Social Security Number• tax identification number,• bank routing number,• bank account number. <p>This information is about identifiable individuals and is “personal information” as defined in section 1(1)(k) of PIPA. The information was collected in Alberta.</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’s auction website was compromised in December 2014. • The Organization was notified of the incident in March 2015 by Google. • An unauthorized individual installed a malicious code within the Organization’s auction website or system. • The malicious code was used to gain unauthorized access to personal information of customers. • The Organization notified law enforcement authorities.
Affected individuals	A total of 900 individuals were affected globally, including one individual from Alberta.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> • The Organization conducted an investigation into the incident. • Personal information was removed from the online auction system. • A new auction system with enhanced security controls was implemented in April 2015. • The Organization suggested steps that affected individuals could take to mitigate against the risk of misuse of their personal information including the review of credit reports and account statements and placing fraud alerts on credit information.
Steps taken to notify individuals of the incident	The affected individual in Alberta was notified via a letter sent on April 2, 2015.
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 explicitly identify any harm that could be caused as a result of this incident, but recommended that affected individuals “remain vigilant for incidents of fraud and identity theft.”</p> <p>In my view, the personal information involved is sensitive financial and identity information. This information could be used to cause the harms of identity theft and fraud. 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 did not provide an assessment of the likelihood that harm would result from the incident.</p> <p>In my view, the likelihood of harm resulting from this incident is increased because the personal information was accessed by unauthorized individuals with malicious intent. In addition, the malicious activity may have been ongoing for 3 months prior to its discovery.</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. The personal information involved sensitive identity and financial information which could be used to cause the significant harms of identity theft and fraud. The information was accessed by an unauthorized individual(s) with malicious intent. In addition, the malicious activity may have been ongoing for 3 months prior to its discovery.</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 had notified the affected individual in accordance with the Regulation. The Organization is, therefore, not required to notify the affected individuals again.</p>	

Jill Clayton
Information and Privacy Commissioner