Office of the Information and
Privacy Commissioner of Alberta

PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	World Learning Center (Organization)
Decision number (file number)	P2017-ND-50 (File #004629)
Date notice received by OIPC	December 23, 2016
Date Organization last provided information	March 17, 2017
Date of decision	April 1, 2017
Summary of decision	There is a real risk of significant harm to the individual affected by this incident. The Organization is required to notify the individual pursuant to section 37.1 of the *Personal Information Protection Act* (PIPA).
JURISDICTION	
Section 1(1)(i) of PIPA "organization"	The Organization is an "organization" as defined in section 1(1)(i)(i) of PIPA.
Section 1(1)(k) of PIPA "personal information"	Some or all of the following information was involved in this incident: • name, • date of birth, • passport information (including issuing country, issue and expiration dates, and passport number), • permanent address, • email address, • telephone number, • limited academic information relating to exams and assignments, and • limited medical information. This information is about identifiable individuals and is "personal information" as defined in section 1(1)(k) of PIPA. The Organization was unable to confirm if the personal information at issue concerning the single affected Alberta resident was collected in Alberta via the Organization's online admissions system, or at the Organization's program office in Vermont, USA. To the extent the information was collected in Alberta, I have jurisdiction in this matter

DESCRIPTION OF INCIDENT	
☒ loss ❑ unauthorized access ❑ unauthorized disclosure	
Description of incident	• On November 21, 2016, a laptop computer owned by a faculty member of the Organization's School of International Training Study Abroad Finance program was stolen in Geneva, Switzerland. The information at issue was stored on the laptop. • The laptop was password protected but not encrypted The Organization reported there is no evidence indicating that the security of the password has been compromised. • The laptop has not been recovered.
Affected individuals	The incident affected one (1) resident of Alberta.
Steps taken to reduce risk of harm to individuals	• Reported the theft to local law enforcement. • Conducted investigation to determine scope of incident. • Offered 1 year free identity theft protection services. • Reviewing policies and procedures related to the security of portable electronic devices. • Notifying regulators and universities at which all impacted students are enrolled.
Steps taken to notify individuals of the incident	The affected Alberta resident was notified of the incident in correspondence sent on or around December 7, 2016.
REAL RISK OF SIGNIFICANT HARM ANALYSIS	
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.	The Organization did not specifically identify the harm that could result from this incident but did report that it was offering all impacted individuals "1 free year of identity theft protection services… and is providing these individuals with helpful information on how to protect against identity theft and fraud." In my view the contact and identity information, particularly in combination with education and medical information, could be used to cause the harms of identity theft, fraud, and financial loss. Email address could also be used for phishing purposes. These are significant harms.
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.	The Organization did not specifically provide its assessment of the likelihood that harm would result from this incident. In my view, the likelihood of harm resulting is increased because the incident was the result of malicious intent (theft), the laptop was not encrypted, and has not been recovered.

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 individual in Alberta. The contact and identity information, particularly in combination with education and medical information, could be used to cause the harms of identity theft, fraud, and financial loss. Email address could also be used for phishing purposes. These are significant harms. The likelihood of harm resulting is increased because the incident was the result of malicious intent (theft), the laptop was not encrypted, and has not been recovered. I require the Organization to notify the affected individual in Alberta in accordance with section 19.1 of the *Personal Information Protection Act Regulation* (Regulation). I understand the Organization notified the affected individual in correspondence sent on or around December 7, 2016. The Organization is not required to notify the affected individual again.

Jill Clayton
Information and Privacy Commissioner