



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Preferred Hotels & Resorts (Organization)
Decision number (file number)	P2018-ND-043 (File #007963)
Date notice received by OIPC	March 5, 2018
Date Organization last provided information	March 5, 2018
Date of decision	March 16, 2018
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 information at issue could include:</p> <ul style="list-style-type: none">• name,• contact information, and• credit or debit card information. <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 online Central Reservation System (CRS).</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">• On January 25, 2018, the Organization was notified by its third party reservation service provider, Sabre/SynXis, that an unauthorized party gained access to user credentials that enabled the party to view certain reservation information between June of 2016 and November of 2017.

	<ul style="list-style-type: none"> The service provider advised that the information in these reservations that was accessed may have included certain payment card data belonging to certain individuals who provided card details when making reservations at some of the Organization’s hotels.
Affected individuals	Approximately 1,330 Alberta residents were affected.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> Initiated an investigation and communicated extensively with the vendor to learn more about what occurred. The vendor has informed the Organization that it has enhanced security around its access credentials and the monitoring of system activity to further detect and prevent unauthorized access. Vendor reportedly notified law enforcement and payment card brands. Cooperating with the vendor to improve the security and protection of all reservations information and to enhance all systems to help prevent this type of incident from recurring. Provided information and resources to affected individuals.
Steps taken to notify individuals of the incident	The Organization reported it would begin mailing written notice of the incident to affected individuals on or about March 5, 2018.
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 reported that it “In some cases incidents that affect credit card numbers could potentially result in attempted or fraudulent transactions involving that card.”</p> <p>In my view, the financial information at issue could be used to cause the harms of identity theft, fraud and financial loss. 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 specifically assess the likelihood of harm occurring in this case but reported “Out of an abundance of caution, [the Organization] is notifying the potentially affected Alberta residents about this incident and providing information and resources to help these individuals protect themselves.”</p> <p>In my view, the likelihood of harm resulting from this incident is increased because the incident was the result of malicious intent (deliberate unauthorized intrusion) and the information was exposed for approximately a year and a half.</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 financial information at issue could be used to cause the harms of identity theft, fraud and financial loss. The likelihood of harm resulting from this incident is increased because the incident was the result of malicious intent (deliberate unauthorized intrusion) and the information was exposed for approximately a year and a half.

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

In its report of the incident, the Organization said that it would begin mailing written notice of the incident to affected individuals on or about March 5, 2018. The Organization is not required to notify affected individuals again.

Jill Clayton
Information and Privacy Commissioner