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	Amsterdam Printing & Litho (Organization)
Decision number (file number)	P2019-ND-164 (File #013322)
Date notice received by OIPC	May 29, 2019
Date Organization last provided information	May 29, 2019
Date of decision	November 20, 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 the individuals whose personal information was collected in Alberta, pursuant to section 37.1 of the *Personal Information Protection Act* (PIPA).
JURISDICTION	
Section 1(1)(i) of PIPA "organization"	The Organization is located in New York, USA, and is an "organization" as defined in section 1(1)(i) of PIPA.
Section 1(1)(k) of PIPA "personal information"	Information involved in the breach may have included: • name, and • payment card information (card number, expiry date, CVV code). 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 via the Organization's ecommerce website www.amsterdamprinting.com.
DESCRIPTION OF INCIDENT	
❑ loss ☒ unauthorized access ❑ unauthorized disclosure	
Description of incident	• On February 13, 2019, the Organization detected a possible security incident involving its website. • On April 16, 2019, the investigation determined that payment card information for customers who used its website between February 1 and 13, 2019 may have been acquired without authorization.

Affected individuals	The incident affected 17 residents of Alberta.
Steps taken to reduce risk of harm to individuals	• Launched an investigation and retained a digital forensics firm to determine the scope of the incident and whether personal information was affected. • Notified all payment card brands whose payment card accounts were affected, all credit reporting agencies, and the Federal Bureau of Investigation.
Steps taken to notify individuals of the incident	Affected individuals were notified by letter on May 14, 2019.
REAL RISK OF SIGNIFICANT HARM ANALYSIS	
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.	The Organization did not specifically identify any harms that might result from the incident, but its notification to affected individuals recommended they "…review… account statements for discrepancies or unusual activity and report any suspicious activity to your bank or credit card company." In my view, a reasonable person would consider that the financial information at issue could be used to cause the significant harms of identity theft and fraud.
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 assess the likelihood of harm resulting from this incident. In my view, a reasonable person would consider the likelihood of harm resulting from this incident is increased as the breach was the result of malicious intent by an unknown third party and it appears the information may have been exposed for approximately 2 months.
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. A reasonable person would consider that the financial information at issue could be used to cause the significant harms of identity theft and fraud. The likelihood of harm resulting from this incident is increased as the breach was the result of malicious intent by an unknown third party and it appears the information may have been exposed for approximately 2 months. I require the Organization to notify the affected individuals whose personal information was collected in Alberta in accordance with section 19.1 of the *Personal Information Protection Act Regulation* (Regulation).	

I understand affected individuals were notified by letter on May 14, 2019. The Organization is not required to notify affected individuals again.

Jill Clayton
Information and Privacy Commissioner