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	National Wildlife Federation (Organization)
Decision number (file number)	P2019-ND-170 (File #013370)
Date notice received by OIPC	May 31, 2019
Date Organization last provided information	May 31, 2019
Date of decision	November 22, 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 an "organization" as defined in section 1(1)(i) of PIPA.
Section 1(1)(k) of PIPA "personal information"	Information involved in the breach included: • name, • address, • credit or debit card number, expiry date, and security code (or CVV). 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 ecommerce website.
DESCRIPTION OF INCIDENT	
❑ loss ☒ unauthorized access ❑ unauthorized disclosure	
Description of incident	• On or about April 25, 2019, the Organization identified signs that a back-end database hosted by a third-party vendor that contained customer information was accessed without authorization.

	• The Organization's investigation found the back-end database was accessed on or around January 3, 2019. The database involved was used to maintain customer information to assist with processing of payments and fulfilment of customer orders.
Affected individuals	The incident affected 99 Alberta residents.
Steps taken to reduce risk of harm to individuals	• Worked with third party forensic investigators to determine what happened and what information was involved. • Worked with third-party vendor to implement additional security measures • Working with law enforcement to investigate the incident and reported the incident to the credit card companies. • Providing written notice of the incident to other state regulators and the consumer reporting agencies, as required.
Steps taken to notify individuals of the incident	Affected individuals were notified by letter on May 24, 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 reported that it is "…is providing all impacted individuals with guidance on how to better protect against identity theft and fraud". 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 appears to be the result of malicious intent (deliberate, unauthorized access) and the breach was not discovered for 3 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 appears to be the result of malicious intent (deliberate, unauthorized access) and the breach was not discovered for 3 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 individuals were notified by letter on May 24, 2019. The Organization is not required to notify affected individuals again.

Jill Clayton
Information and Privacy Commissioner