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	CAM LLP (Organization)
Decision number (file number)	P2020-ND-107 (File #015913)
Date notice received by OIPC	May 26, 2020
Date Organization last provided information	May 31, 2020
Date of decision	September 24, 2020
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 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"	The incident involved all or some of the following information: • name, • address, • email address, • social insurance number, • drivers' license details, • employment information (paystubs, Notices of Assessment, employer name, location and particulars of employment), • Alberta Health Care Number, and • medical information. This information is about identifiable individuals and is "personal information" as defined in section 1(1)(k) of PIPA.
DESCRIPTION OF INCIDENT	
☒ loss ❑ unauthorized access ❑ unauthorized disclosure	

Description of incident	• On May 24, 2020, an employee with the Organization had her car stolen from her driveway. • In her car, there was a briefcase with hard copies of client files. • The client files have not been recovered to date.
Affected individuals	The incident affected approximately 4 individuals.
Steps taken to reduce risk of harm to individuals	Sent a reminder to all staff regarding the safeguarding of client files when taken out of the office.
Steps taken to notify individuals of the incident	Affected individuals were notified by telephone on May 29, 2020 and by letter on June 8, 2020.
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 "Personal hurt and feelings of violation of trust relationship; identity theft" may occur as a result of the breach. In my view, a reasonable person would consider that the contact, identity, employment and medical information at issue could be used to cause the significant harms of identity theft, fraud and financial loss. Email addresses could be used for the purposes of phishing, increasing vulnerability to identity theft and fraud. Medical information could be used to cause humiliation and embarrassment. These are all 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 reported that, *I expect that their [sic] will be personal hurt and feeling of violation; I do not expect identity theft as I do not expect the thieves are interest in the contents of the briefcase – accordingly [sic] to police they are generally looking for money and goods that they can quickly exchange for money for drugs.* In my view, a reasonable person would consider the likelihood of harm resulting from this incident is increased because it resulted from malicious intent (theft) and the documents have not been recovered. The Organization can only speculate as to the thief's motive.
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 contact, identity, employment and medical information at issue could be used to cause the significant harms of identity theft, fraud and financial loss. Email	

addresses could be used for the purposes of phishing, increasing vulnerability to identity theft and fraud. Medical information could be used to cause humiliation and embarrassment. These are all significant harms. The likelihood of harm resulting from this incident is increased because it resulted from malicious intent (theft) and the documents have not been recovered. The Organization can only speculate as to the thief's motive.

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

I understand the affected individuals were notified by telephone on May 29, 2020 and by letter on June 8, 2020, in accordance with the Regulation. The Organization is not required to notify the individuals again.

Jill Clayton
Information and Privacy Commissioner