

Privacy Matters



Presentation to: Southern Alberta Risk and Insurance Association
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Overview

1. What is Privacy Risk Management
2. FCF Privacy Program
3. Privacy Incidents & Incident Response
4. Privacy Legislative Updates – 2010 Review
5. What's on the Horizon for 2011?
6. Privacy Breach Notification
7. OIPC
8. Privacy Hot Buttons

About us

- ✓ First Calgary Financial is Alberta's second-largest credit union with over \$2.5 billion in assets under administration.
- ✓ In addition to its 16 retail banking branches, First Calgary Financial also offers 13 one 2 one Financial Consulting™ centres, a Commercial Banking group, a Dealer Services team, a locally-based contact centre, Business Solutions Centre and Just Financial.
- ✓ Since 1999, First Calgary Financial has been selected as one of Canada's 50 Best Managed Companies – a Platinum Club member
- ✓ Recognized as one of Alberta's Top 50 Employer since 2006
- ✓ First Calgary Financial's almost 500 employees are proud to be leading, learning and living in the communities they serve.
- ✓ For more information, visit firstcalgary.com

Introduction

Protection of member data is non-negotiable

Privacy Risk Management

Privacy is **NOT** just a compliance issue

- It's a service issue
- It's a security issue
- It's a business issue
- It's a risk management issue

Privacy is an enterprise-wide challenge

Privacy Program - Highlights

- Privacy management framework
- Good privacy policies
- Enterprise privacy governance structure
- Privacy is a strategic risk
- Employee privacy training
- Privacy Impact Assessments
- Managing service providers

Privacy Incidents



The most common causes of privacy incidents at credit unions resulted from unintentional human failure of privacy and security practices:

- Misdirected faxes
- Sensitive data transmitted via email to unauthorized users
- Improper disposal of paper records
- Theft of laptop with unencrypted customer data
- Information given to person not authorized
- Staff communicating sensitive information in public forum
- IT programming errors
- Use, collection and storage of information

We have also had a few incidents from external sources:

- Outsourcing data to partners
- Spoofing, hacking, phishing, pharming, vishing, smishing, etc.

Incident Response & Notification

- The number has not changed in past 3 years
- Paper vs. electronic records
- Notification method
- Breach Response Protocol
- Response Costs
- Member reaction to incidents

Privacy Updates -2010 Year In Review

1. Legislative updates

- PIPA
 - Mandatory Breach Notification
 - Employee-Employer relationship
 - Service providers
- Bill C-28 “FISA”

2. Legal updates

- Bill S-4

Privacy Updates – What's on the Horizon?

- Amendments to PIPEDA
- Lawful Access Bills
- Industry and Tech Developments
- GPS Tracking
- Social Networking Phenomenon
- Workplace Privacy
- Cross-border privacy



Privacy Breach Notification



Our position :

- Notification is a good privacy practice

“Members should be notified whenever we become aware of an incident of unauthorized access to sensitive member information and, at the conclusion of a reasonable investigation, determines that misuse has occurred or is reasonably possible..”

- Real risk of serious harm is a guide, but we take it a bit farther.....its the right thing to do!
- We voluntarily declare

Mandatory Privacy Breach Notification

- New legislation has opened the door to a few questions.
- Definition of RROSH
- Notification timelines “without unreasonable delay”
- Differences in legislation

Office of the Privacy Commissioner of AB (OIPC)

Manage and enforce Personal Information Protection Act (PIPA)



The Commissioner can:

- refer an individual to another grievance, complaint or review process before dealing with the complaint
- authorize mediation to settle a complaint
- conduct an inquiry
- issue binding orders
- authorize an organization to disregard requests
- can make investigation reports public

Privacy Hot Buttons



- ❖ IT Security
- ❖ 3rd Party/Vendor Outsourcing
- ❖ Online Banking – Mobile technologies
- ❖ Mobile & Portable Storage Devices
- ❖ Social Media & Social Networking

Thank you!

Questions?

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Copies of the presentation are available by contacting me directly