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VIA EMAIL

March 29, 2019

[applicant information]

Dear

Re: Request for Records: BCLC File 19-022

British Columbia Lottery Corporation (BCLC) writes further to your February 19, 2019 request under B.C.'s *Freedom of Information and Protection of Privacy Act* (FIPPA).

You requested:

- “Data related to any confirmed data breaches at playnow.com since 2009 with a count of the number of affected users in each one. Also the number of reported account take overs or stolen accounts per day since 2009 on playnow.com.”

1. Data breaches at playnow.com since 2009

BCLC does not define “data breach.” In searching for records, BCLC has applied the definition in ISO Standard 27040, in which a data breach is defined as a “compromise of security that leads to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to protected data transmitted, stored, or otherwise processed.”

ISO Standard 27040 is available to review at the following web address:

<https://www.iso.org/obp/ui/#iso:std:iso-iec:27040:ed-1:v1:en>

For this part of your request, BCLC is providing publicly available information of a BCLC privacy breach which can also be considered a “data breach,” applying the above definition. The information and record you seek is outlined in the Office of the Information and Privacy Commissioner’s (OIPC) Investigation Report F11-01 (the “Report”). The Report is publicly available at the following web address:

<https://www.oipc.bc.ca/investigation-reports/1242>

A copy of the Report is also enclosed for convenience.

At paragraph 17 (page 5) of the Report, the former OIPC Commissioner stated:

“BCLC conducted an internal investigation and identified the cause of the breach as a “data crossover” caused by a default configuration setting within the computer server environment. The effect was that under certain conditions, including high customer traffic, the “data crossover” caused some customers to be switched to the accounts of other customers.”

Therefore, applying the ISO Standard 27040 definition of data breach, the July 15, 2010 data crossover event can also be considered a data breach at playnow.com.

At paragraph 19 (page five) of the Report, the former Commissioner stated:

“BCLC also reviewed the information each of its PlayNow.com customers had been able to view during the time they were logged into their accounts. BCLC’s investigation revealed that 134 PlayNow.com customers’ personal information could potentially have been viewed by 105 other customers of PlayNow.com. Of these 134 customers, BCLC was able to verify that 18 actually had their personal information viewed by someone else.”

BCLC has no other records of a data breach at playnow.com from January 1, 2009 to February 19, 2019.

Therefore, from January 1, 2009 to February 19, 2019, one data breach occurred at playnow.com and is confirmed to have affected 18 users.

2. Account take overs or stolen accounts per day since 2009

In searching for records, BCLC has interpreted “account take overs or stolen accounts” as any time a player claims it was someone other than themselves who accessed their account, whether that claim is substantiated or not.

BCLC does not have an existing record of account takeovers or stolen accounts per day since 2009 on playnow.com.

Section 6(2) of FIPPA states that “the head of a public body must create a record for an applicant if

(a) the record can be created from a machine readable record in the custody or under the control of a public body using its normal computer hardware and software and technical expertise, and

(b) creating the record would not unreasonably interfere with the operations of the public body.”

BCLC concludes that section 6(2) of FIPPA does not require BCLC to create a record in these circumstances, because to do so would unreasonably interfere with BCLC’s operations, for the reasons that follow.

BCLC does not specifically track “account take overs” or “stolen accounts” in any of its databases. BCLC tracks transaction disputes as a broad category. To create the record you have requested would require the following steps:

- Manually review hundreds of transaction dispute files in BCLC databases;
- Analyze whether or not each transaction dispute file equates to an account take over or stolen account;
- Extract the data and populate a spreadsheet; and
- Review the extracted data for accuracy.

BCLC estimates that this work would require in the hundreds of hours and involve significant manual processing rather than a simple data extract. Therefore, BCLC is of the view that section 6(2) does not require BCLC to create a record in these circumstances.

BCLC’s response will be published a minimum of five business days after release at:

<https://corporate.bcl.com/who-we-are/corporate-reports/reports-disclosures.html>

If you have any questions or concerns regarding BCLC’s processing of your request, please contact me via e-mail at bmadill@bcl.com or at 250-852-5207.

Additionally, under section 52 of FIPPA, you may ask the Information and Privacy Commissioner to review this reply to your request for information. You have 30 business days from the receipt of this notice to request a review by writing to:

Office of the Information and Privacy Commissioner for British Columbia
P.O. Box 9038, Station Provincial Government
Victoria, BC V8W 9A4
T (250) 387-5629 F (250) 387-1696
Email: info@oipc.bc.ca Online: www.oipc.bc.ca

Sincerely,
[original signed by]

Bob Madill
Manager, FOI and Information Governance

Enclosure