



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Allstate Insurance Company of Canada (Organization)
Decision number (file number)	P2014-ND-04 (File #P2687)
Date notice received by OIPC	May 15, 2014
Date Organization last provided information	June 27, 2014
Date of decision	July 14, 2014
Summary of decision	There is a real risk of significant harm to the individuals affected by this incident. The Organization is required to notify those individuals pursuant to section 37.1 of the <i>Personal Information Protection Act</i> (PIPA).
JURISDICTION	
Section 1(1)(i) of PIPA “organization”	<p>The Organization is federally incorporated and licenced under the Alberta <i>Insurance Act</i> to carry on business in Alberta.</p> <p>I have jurisdiction because the Organization is an “organization” as defined in section 1(1)(i)(i) of PIPA.</p>
Section 1(1)(k) of PIPA “personal information”	<p>The incident involved the following information for all individuals:</p> <ul style="list-style-type: none">• name,• address,• driver’s licence number,• loss history (including previous accidents or policy violations),• date of birth, and• vehicle information and property information. <p>In addition, the incident involved the following information for some of the individuals:</p>

	<ul style="list-style-type: none"> • bank account information (for one individual), and • credit card number and expiry date (for five individuals). <p>This information is “personal information” as defined in section 1(1)(k) of PIPA and was collected in Alberta.</p>
DESCRIPTION OF INCIDENT	
<input type="checkbox"/> loss <input checked="" type="checkbox"/> unauthorized access <input type="checkbox"/> unauthorized disclosure	
Description of incident	<ul style="list-style-type: none"> • An employee of the Organization created fictitious policies for the affected individuals in order to influence the employee’s work performance record. • There were 11 policies created.
Affected individuals	6 individuals were affected, all of which were Alberta residents.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> • Reimbursement of financial losses to affected individuals. • Computer search of the employee’s files and emails conducted to verify personal information of the individuals was not stored elsewhere by the employee. • Adjusted the affected individuals’ records so this incident will not be on their file when dealing with other insurance companies.
Steps taken to notify individuals of the incident	Notification sent by mail to affected individuals by July 4, 2014. The Organization also attempted to contact each affected individual by phone.
REAL RISK OF SIGNIFICANT HARM ANALYSIS	
Harm Some damage or detriment or injury that could be caused to the 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.	<p>The Organization recognized the affected individuals may be at risk for financial loss as well as identity theft or fraud. The Organization confirmed the information at issue was used to bill the affected individuals for the fictitious policies.</p> <p>In my view, the personal information involved is sensitive. It contains identity information such as date of birth and credit card or banking information. The types of harm that could result from unauthorized access to the personal information in this instance are identity theft and fraud. In my view, these are significant harms.</p>
Real Risk The likelihood that the significant harm will result must be more than mere	The Organization reported that due to the personal information involved, it considered there to be a real risk of significant harm to the affected individuals. The risk materialized when the personal information of the 6 affected individuals was used

<p>speculation or conjecture. There must be a cause and effect relationship between the incident and the possible harm.</p>	<p>without authorization.</p> <p>The Organization reported that the employee is no longer employed by the Organization but it cannot confirm that the employee did not record the information obtained prior to leaving the Organization.</p>
<p>DECISION UNDER SECTION 37.1(1) OF PIPA</p>	
<p>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. The personal information involves sensitive identity information, such as date of birth and financial information. The information was used to cause harm, and the Organization is unable to confirm that its former employee did not record the information elsewhere. These factors contributed significantly to my decision.</p> <p>I require the Organization to notify the affected individuals in accordance with section 19.1 of the <i>Personal Information Protection Act Regulation</i> (Regulation).</p> <p>I understand the Organization notified the affected individuals via telephone and mail on or before July 4, 2014 in accordance with the Regulation. The Organization is, therefore, not required to notify the affected individuals again.</p>	

Jill Clayton
Information and Privacy Commissioner