



**PERSONAL INFORMATION PROTECTION ACT**  
**Breach Notification Decision**

<b>Organization providing notice under section 34.1 of PIPA</b>	World Financial Group Insurance Agency of Canada Inc. (Organization)
<b>Decision number (file number)</b>	P2015-ND-11 (File #P2836)
<b>Date notice received by OIPC</b>	August 28, 2014
<b>Date Organization last provided information</b>	October 16, 2014
<b>Date of decision</b>	March 16, 2015
<b>Summary of decision</b>	There is a 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).
<b>JURISDICTION</b>	
<b>Section 1(1)(i) of PIPA “organization”</b>	The Organization is incorporated in Toronto, Ontario. I have jurisdiction because the Organization is an “organization” as defined in section 1(1)(i)(i) of PIPA.
<b>Section 1(1)(k) of PIPA “personal information”</b>	The incident involved the following information for 7 clients of the Organization: <ul style="list-style-type: none"><li>• name,</li><li>• date of birth,</li><li>• mailing address,</li><li>• email address,</li><li>• telephone number (workplace),</li><li>• social insurance number (SIN),</li><li>• financial needs analysis,</li><li>• medical information,</li><li>• void cheque,</li><li>• issued insurance policy,</li><li>• unsigned policy receipt.</li></ul>

	<p>The names and telephone numbers of an additional 6 clients are also at issue.</p> <p>This information is “personal information” as defined in section 1(1)(k) of PIPA and was collected in Alberta.</p>
<b>DESCRIPTION OF INCIDENT</b>	
<p><input checked="" type="checkbox"/> loss                      <input type="checkbox"/> unauthorized access                      <input type="checkbox"/> unauthorized disclosure</p>	
<b>Description of incident</b>	<ul style="list-style-type: none"> <li>• On August 17, 2014, in Calgary, Alberta, an authorised agent (contractor) of the Organization had his locked car broken into. A laptop and paper records containing the personal information at issue were taken from the vehicle. The laptop was password protected but not encrypted.</li> <li>• The agent discovered the loss the same day when he returned to his car. Calgary Police Service was notified on August 17, 2014.</li> <li>• The laptop has not been recovered.</li> </ul>
<b>Affected individuals</b>	13 clients of the Organization, who are residents of Alberta, were affected.
<b>Steps taken to reduce risk of harm to individuals</b>	Fraud alerts were placed on clients’ accounts with Equifax and TransUnion Canada.
<b>Steps taken to notify individuals of the incident</b>	<ul style="list-style-type: none"> <li>• The agent contacted the individuals verbally after the incident occurred.</li> <li>• Notifications were sent by mail on September 19, 2014.</li> </ul>
<b>REAL RISK OF SIGNIFICANT HARM ANALYSIS</b>	
<p><b>Harm</b> 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.</p>	<p>The Organization reported the affected individuals could be at risk of “identity theft, security risk and financial loss.”</p> <p>In my view, the personal information involved is highly sensitive for the seven individuals whose social insurance numbers, dates of birth, medical and financial information were involved. This personal information could be used to cause the harms of identity theft and/or fraud, as well as hurt, humiliation and embarrassment. In my view, these are significant harms.</p> <p>In my view, the personal information of the other six individuals (name and address) is of low sensitivity and could not be used to cause significant harm.</p>

<p><b>Real Risk</b> 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.</p>	<p>The Organization reported the thieves were most likely after the laptop computer. Some of the paper records were recovered, however the laptop was not. The promptness of reporting the theft to authorities and to the affected individuals may reduce the likelihood of harm.</p> <p>In my view, there is a real risk of harm resulting from this incident. The breach is the result of malicious intent, and the laptop has not been recovered.</p>
<b>DECISION UNDER SECTION 37.1(1) OF PIPA</b>	
<p>Based on the information provided by the Organization and given the circumstances of the incident, I have decided that:</p> <ul style="list-style-type: none"> <li>• there is no real risk of significant harm to the six individuals whose information included only name and address. This information could not be used to cause significant harm.</li> <li>• there is a real risk of significant harm to the seven individuals whose personal information involved sensitive information such as SIN numbers, dates of birth and medical information. The breach is the result of malicious intent, and the personal information has not been recovered.</li> </ul> <p>I require the Organization to notify the seven individuals mentioned above in accordance with section 19.1 of the <i>Personal Information Protection Act Regulation</i> (Regulation).</p> <p>I understand the Organization notified all 13 individuals by telephone on August 17, 2014 and by letters sent on September 19, 2014 in accordance with section 19.1 of the <i>Personal Information Protection Act Regulation</i>. The Organization is, therefore, not required to notify the affected individuals again.</p>	

Jill Clayton  
Information and Privacy Commissioner