



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Aegon USA (Organization)
Decision number (file number)	P2015-ND-63 (File #P2884)
Date notice received by OIPC	October 22, 2014
Date Organization last provided information	August 13, 2015
Date of decision	October 21, 2015
Summary of decision	There is a real risk of significant harm to the individual affected by this incident. The Organization is required to notify the individual pursuant to section 37.1 of the <i>Personal Information Protection Act</i> (PIPA).
JURISDICTION	
Section 1(1)(i) of PIPA “organization”	The Organization is an “organization” as defined in section 1(1)(i)(i) of PIPA. The incident took place in Alberta.
Section 1(1)(k) of PIPA “personal information”	<p>The incident involved all or some of the following information:</p> <ul style="list-style-type: none">• name,• home address,• email address,• date of birth,• telephone number,• Social Insurance Number,• general account information. <p>This information is “personal information” as defined in section 1(1)(k) of PIPA.</p>

DESCRIPTION OF INCIDENT	
<input checked="" type="checkbox"/> loss <input type="checkbox"/> unauthorized access <input type="checkbox"/> unauthorized disclosure	
Description of incident	<ul style="list-style-type: none"> • A vehicle belonging to one of the Organization’s agents was broken into. Personal belongings were stolen, including a laptop bag containing a client T2033 transfer form. • The incident was discovered on October 7, 2014 when the agent attempted to enter the vehicle. • The vehicle had been locked and the laptop bag was not in plain view.
Affected individuals	One (1) Albertan was affected.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> • The affected individual was immediately notified of the incident verbally. • The incident was reported to the RCMP. • The Organization’s Head Office was notified.
Steps taken to notify individuals of the incident	Notification sent to affected individual by mail on October 29, 2014.
REAL RISK OF SIGNIFICANT HARM ANALYSIS	
<p>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>	<p>The Organization reported that possible harms resulting from this incident included identity theft, security risk and financial loss.</p> <p>I agree with the Organization’s assessment. The information at issue could be used to cause identity theft, risk to security and financial loss. These are significant harms.</p>
<p>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.</p>	<p>The Organization reported a “potential” risk to one individual, but that no vulnerable individuals were involved. The Organization noted the information at issue, particularly the Social Insurance Number, is sensitive.</p> <p>In my view, there is a real risk of harm resulting from this incident. The information was stolen, indicating malicious intent, and was not been recovered.</p>

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 individual. The personal information at issue could be used to cause the significant harms of identity theft, risk to security and financial loss. The information was stolen and has not been recovered. These factors contributed significantly to my decision.

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

I understand the Organization notified the affected individual by letter dated October 29, 2014, in accordance with the Regulation. The Organization is, therefore, not required to notify the affected individuals again.

Jill Clayton
Information and Privacy Commissioner