



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

<b>Organization providing notice under section 34.1 of PIPA</b>	Ivari Canada ULC (Organization)
<b>Decision number (file number)</b>	P2016-ND-02 (File #001878)
<b>Date notice received by OIPC</b>	November 13, 2015
<b>Date Organization last provided information</b>	November 13, 2015
<b>Date of decision</b>	January 13, 2016
<b>Summary of decision</b>	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).
<b>JURISDICTION</b>	
<b>Section 1(1)(i) of PIPA “organization”</b>	The Organization is an “organization” as defined in section 1(1)(i) of PIPA.
<b>Section 1(1)(k) of PIPA “personal information”</b>	<p>The incident involved the following information:</p> <ul style="list-style-type: none"><li>• name,</li><li>• address,</li><li>• Social Insurance Number (SIN),</li><li>• date of birth,</li><li>• health information,</li><li>• driver’s license number,</li><li>• home telephone number,</li><li>• annual income, and</li><li>• net worth.</li></ul> <p>This information is about identifiable individuals and is “personal information” as defined in section 1(1)(k) of PIPA. The information was collected in Alberta.</p>

<b>DESCRIPTION OF INCIDENT</b>	
<input checked="" type="checkbox"/> loss <input type="checkbox"/> unauthorized access <input type="checkbox"/> unauthorized disclosure	
<b>Description of incident</b>	<ul style="list-style-type: none"> <li>• On October 22, 2015, the Organization shipped a package to a branch office using a courier service. The package contained insurance contracts, applications and medical information.</li> <li>• On November 3, 2015, the Organization realized the package had not been delivered to its destination and contacted the courier service. The service indicated that the package had been passed on to another courier service for delivery, and that party’s delivery vehicle had been broken into. The package was stolen from the vehicle.</li> <li>• The package has not been recovered.</li> </ul>
<b>Affected individuals</b>	Two (2) customers were affected by this incident.
<b>Steps taken to reduce risk of harm to individuals</b>	<ul style="list-style-type: none"> <li>• Fraud alerts were offered to the affected individuals.</li> <li>• Additional security requirements have been added to the affected individuals’ files at the Organization.</li> </ul>
<b>Steps taken to notify individuals of the incident</b>	Notification sent by mail to affected individuals on November 12, 2015.
<b>REAL RISK OF SIGNIFICANT HARM ANALYSIS</b>	
<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>The Organization recognized the affected individuals may be at risk for identity theft, financial loss and fraud, as well as possible humiliation.</p> <p>I agree with the Organization. The personal information involved is sensitive, and includes medical information as well as identity information. This information could be used to cause the harms of identity theft, fraud, financial loss and hurt and humiliation. These are significant harms.</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>In assessing the likelihood of harm resulting from this incident, the Organization indicated the information is highly sensitive and has not been recovered.</p> <p>In my view, the likelihood of harm resulting is increased because the incident resulted from a vehicle break-in and theft, indicating malicious intent. The information has 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 individuals. The personal information involved is sensitive, and includes medical information as well as identity information. This information could be used to cause the significant harms of identity theft, fraud, financial loss and hurt and humiliation. The likelihood of harm resulting is increased because the incident resulted from a vehicle break-in and theft, indicating malicious intent. The information has not been recovered.

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

I understand the Organization notified the affected individuals in a letter dated November 12, 2015, in accordance with the Regulation.

Jill Clayton  
Information and Privacy Commissioner