



**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>	P2017-ND-53 (File #003628)
<b>Date notice received by OIPC</b>	August 30, 2016
<b>Date Organization last provided information</b>	March 31, 2017
<b>Date of decision</b>	May 15, 2017
<b>Summary of decision</b>	There is a 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).
<b>JURISDICTION</b>	
<b>Section 1(1)(i) of PIPA “organization”</b>	The Organization is incorporated in Toronto, Ontario, and is an “organization” as defined in section 1(1)(i)(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>• mailing address,</li><li>• social insurance number (SIN),</li><li>• date of birth,</li><li>• telephone number,</li><li>• email address, and</li><li>• account number/holdings.</li></ul> <p>This information is about an identifiable individual and is “personal information” as defined in section 1(1)(k) of PIPA. The information was collected in Alberta and the incident occurred 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 August 19, 2016, in Calgary, Alberta, a locked vehicle belonging to an authorised agent (contractor) of the Organization was broken into.</li> <li>A laptop and paper file in a briefcase containing the personal information at issue were stolen.</li> <li>The agent discovered the loss the same day when he returned to his car.</li> <li>The information has not been recovered.</li> </ul>
<b>Affected individuals</b>	The incident affected one resident of Alberta.
<b>Steps taken to reduce risk of harm to individuals</b>	<ul style="list-style-type: none"> <li>Calgary Police Service was notified on August 19, 2016.</li> <li>Fraud alerts were placed on the client’s accounts with Equifax Canada.</li> <li>Changed processes to prohibit leaving files in vehicle.</li> </ul>
<b>Steps taken to notify individuals of the incident</b>	The affected individual was notified verbally on August 19, 2017.
<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.	The Organization reported “the thief could pass the information to anyone and be used for fraud, identity theft or other criminal action.”  I agree with the Organization. The contact, identity and financial information at issue could be used to cause the harms of identity theft and fraud. These are significant harms.
<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.	In assessing the likelihood of harm resulting from this incident, the Organization reported the “Information still not recovered by police” and “the client is a senior.”  In my view, there is a real risk of harm resulting from this incident. The breach is the result of malicious intent (vehicle break-in and theft), and the information has not been recovered.
<b>DECISION UNDER SECTION 37.1(1) OF PIPA</b>	
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 resulting from this incident. The contact, identity and financial information at issue could be used to cause the significant harms of identity theft and fraud. The breach is the result of malicious intent (vehicle break-in and theft), and the information has not been recovered.	

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 telephone on August 19, 2016 in accordance with section 19.1 of the Regulation. The Organization is not required to notify the affected individual again.

Jill Clayton  
Information and Privacy Commissioner