



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Servus Wealth Strategies Ltd. (Organization)
Decision number (file number)	P2017-ND-64 (File #005448)
Date notice received by OIPC	April 19, 2017
Date Organization last provided information	April 19, 2017
Date of decision	May 25, 2017
Summary of decision	There is a real risk of significant harm to the individuals affected by this incident. The Organization is required to notify the individuals 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.
Section 1(1)(k) of PIPA “personal information”	<p>The incident involved the following information:</p> <ul style="list-style-type: none">• name,• address,• Social Insurance Number,• telephone number,• net worth,• insurance information,• copy of void cheque,• employer and income, and• medical information. <p>This information is about identifiable individuals and 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"> • On April 7, 2017, a bag containing a laptop and four paper copy insurance applications were stolen from an employee's vehicle. • The laptop was encrypted and protected by password; however, the paper files were not protected and are not expected to be recovered. • The incident was discovered on April 8, 2017 when the employee noticed that the bag was missing from the vehicle.
Affected individuals	The incident affected 6 individuals in Alberta.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> • Notified law enforcement. • Advised affected individuals to contact Equifax and change banking account information. • Offered 12 month credit monitoring services.
Steps taken to notify individuals of the incident	Affected individuals were notified by telephone on April 13, 2017.
REAL RISK OF SIGNIFICANT HARM ANALYSIS	
<p>Harm 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 that the types of harms that could occur to affected individuals as a result of the breach are "primarily identity theft, fraud, negative effects on a credit record and potential for financial loss."</p> <p>I agree with the Organization's assessment. The identity, financial, and employment information at issue could be used to cause the harms of identity theft, fraud, financial loss, and negative effects on a credit record. Medical information could be used to cause the harms of hurt, humiliation and embarrassment. These are all 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 that "This information was obtained by an unknown assailant who stole a laptop bag containing paper files. The laptop was encrypted and password protected; but there were not [sic] security measures in place for the paper files...This information was stolen and has not yet been recovered. We do not expect to recover the stolen files."</p> <p>In my view, the likelihood of harm resulting from this incident is increased because it resulted from malicious intent (vehicle break-in and theft). The information has not been recovered.</p>
DECISION UNDER SECTION 37.1(1) OF PIPA	
Given the information reported by the Organization, I have concluded there is a real risk of significant harm in this case.	

The identity, financial, and employment information at issue could be used to cause the harms of identity theft, fraud, financial loss, and negative effects on a credit record. Medical information could be used to cause the harms of hurt, humiliation and embarrassment. These are all significant harms. The likelihood of harm resulting from this incident is increased because it resulted from malicious intent (vehicle break-in and theft). The information has not been recovered.

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

I understand affected individuals were notified by telephone on April 13, 2017. The Organization is not required to notify the affected individuals again.

Jill Clayton
Information and Privacy Commissioner