



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Ivari Canada ULC (Organization)
Decision number (file number)	P2017-ND-150 (File #006561)
Date notice received by OIPC	September 13, 2017
Date Organization last provided information	October 24, 2017
Date of decision	November 8, 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 those 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) of PIPA.
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,• address,• date of birth,• Social Insurance Number,• driver's license number,• banking information,• signature, and• medical information. <p>This information is about identifiable individuals and is "personal information" as defined in section 1(1)(k) of PIPA. The incident occurred in Calgary, Alberta.</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 July 7 or 8, 2017, a vehicle belonging to an advisor with the Organization was stolen. • Two life insurance contracts were in the stolen vehicle at the time of the theft. • The Organization discovered the incident on July 8, 2017.
Affected individuals	The incident affected two (2) Alberta residents.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> • Advised the affected individuals or the incident verbally and notified them by letter. • Noted on the affected individuals files that extra authentication and due diligence is required due to privacy breach. • Reported incident to law enforcement.
Steps taken to notify individuals of the incident	Affected individuals were notified verbally on or about July 8, 2017 and by letter on September 7, 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 the possible harm that might result from this incident include “financial loss, fraud, identity theft, negative effect on credit report, and embarrassment.”</p> <p>I agree with the Organization. Identity and financial information could be used for fraud and identity theft and could cause financial loss and a negative effect on a credit report. Health information could be used to cause the harms of hurt, humiliation and embarrassment. 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 that “(t)here is a risk of significant harm as the whereabouts of the contracts is still unknown. The car was recovered by (sic) the documents were not recovered” and “The likelihood that harm could result is high due to the contracts being stolen with the theft of the car.”</p> <p>I agree with the Organization. The likelihood of harm resulting from this incident is increased because the contracts were stolen, indicating malicious intent. In addition, the contracts have 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.	

Identity and financial information could be used for fraud and identity theft and could cause financial loss and a negative effect on a credit report. Health information could be used to cause the harms of hurt, humiliation and embarrassment, These are significant harms. The likelihood of harm resulting from this incident is increased because the contracts were stolen, indicating malicious intent. In addition, the contracts have 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 the Organization notified affected individuals verbally on or about July 8, 2017 and by letter on September 7, 2017 in accordance with the Regulation. The Organization is not required to notify the affected individuals again.

Jill Clayton
Information and Privacy Commissioner