



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Primerica Financial Services (Canada) Ltd. (Organization)
Decision number (file number)	P2018-ND-023 (File #007649)
Date notice received by OIPC	January 31, 2018
Date Organization last provided information	January 31, 2018
Date of decision	February 5, 2018
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 in Alberta 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 the following information:</p> <ul style="list-style-type: none">• name,• address,• telephone number,• date of birth,• driver's licence information, and• Social Insurance Number. <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.</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 January 11, 2018, a representative of the Organization met with a client to discuss investment opportunities. The representative received a cheque and an investment application from the client.

	<ul style="list-style-type: none"> • The documents were in the representative’s bag. That evening, someone broke into the representative's garage and vehicle. Among the items stolen was the bag where all the documents were kept. • The incident was discovered on January 12, 2018 when the representative noticed the garage door was open and the bag was missing from the vehicle.
Affected individuals	The incident affected one (1) resident of Alberta.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> • Reported the incident to law enforcement. • New account numbers were assigned and are being monitored for suspicious activity. • The client contacted her banking institution and credit reporting agencies to notify them of the incident.
Steps taken to notify individuals of the incident	The Organization reported “The representative called the client immediately after becoming aware of the incident. Subsequently, the representative and the client met to discuss the implications of the incident, and to notify the appropriate [sic] authorities about the breach. The client was satisfied with the steps being taken by the representative and the company.”
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 breach of the client's name, driver's licence information, and Social Insurance Number could result in identity theft and fraud.”</p> <p>I agree with the Organization. The contact and identity information at issue could be used to cause the harms of identity theft and fraud. 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:</p> <p><i>There is a high chance this incident could cause significant harm to the client since:</i></p> <ul style="list-style-type: none"> • <i>It is not known who accessed the information;</i> • <i>The information is highly sensitive;</i> • <i>The information could be used for criminal purposes; and</i> • <i>The information has not been recovered.</i>

	I agree with the Organization. The incident was the result of malicious intent (vehicle break-in and theft), and the information has not been recovered.
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DECISION UNDER SECTION 37.1(1) OF PIPA

Given the information reported by the Organization, and considering the circumstances in this case, I have decided that there is a real risk of significant harm to the affected individual.

The contact and identity information at issue could be used to cause the significant harms of identity theft and fraud. The incident was the result of malicious intent (vehicle break-in and theft), and the information has not been recovered.

The Organization is required to notify the affected individual in Alberta in accordance with section 19.1 of the *Personal Information Protection Act Regulation* (Regulation).

I understand the Organization’s representative called the client immediately after becoming aware of the incident. Subsequently, the representative and the client met to discuss the implications of the incident. The Organization is not required to notify the affected individual again.

Jill Clayton
Information and Privacy Commissioner