



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Ivari Canada ULC (Organization)
Decision number (file number)	P2018-ND-072 (File #009026)
Date notice received by OIPC	June 25, 2018
Date Organization last provided information	June 25, 2018
Date of decision	July 5, 2018
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 operates in Alberta and 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,• date of birth,• driver license number (for one individual),• medical information, and• signature. <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 June 9, 2018, the Organization discovered a term life insurance contract was missing.• The contract had been in an advisor’s vehicle, which was stolen.
Affected individuals	The incident affected 2 individuals.

Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> • Offered affected individuals three years of credit monitoring. • Changing account numbers to make identity theft more difficult. • Made a note on the insured's file to require enhanced authentication in the future. • Reported incident to law enforcement.
Steps taken to notify individuals of the incident	<p>Affected individuals were notified by letter sent on June 25, 2018.</p>

REAL RISK OF SIGNIFICANT HARM ANALYSIS

<p>Harm Some damage or detriment or injury that could be caused to the 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 following types of harm could result from the breach:</p> <ul style="list-style-type: none"> - <i>Financial loss</i> - <i>Fraud</i> - <i>Identity theft</i> - <i>Negative effect on credit record</i> - <i>Embarrassment</i> <p>The Organization also said “There was no SIN or credit card or banking information in the application. However, the driver's licence number of one insured, non-sensitive medical information and signatures were in the application” and “we believe there is a risk of significant harm as the limited information could be used to steal the insureds' identity”.</p> <p>I agree with the Organization’s assessment. Identity information could be used to cause the significant harms of identity theft and fraud. Medical information could be used to cause hurt, humiliation and embarrassment. These are all significant harms.</p>
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<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 “We believe the likelihood that harm could result is significant as the information has not been recovered and could be used to steal the insureds' identity”.</p> <p>I agree with the Organization. The breach was the result of malicious intent (theft), and the information has not been recovered.</p>
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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 as a result of this incident.

Identity information could be used to cause the significant harms of identity theft and fraud. Medical information could be used to cause hurt, humiliation and embarrassment. These are all significant harms. The breach was the result of malicious intent (theft), and 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 affected individuals were notified by letter sent on June 25, 2018. The Organization is not required to notify the affected individuals again.

Jill Clayton
Information and Privacy Commissioner