



**PERSONAL INFORMATION PROTECTION ACT**  
**Breach Notification Decision**

<b>Organization providing notice under section 34.1 of PIPA</b>	Sun Life Assurance Company of Canada (Organization)
<b>Decision number (file number)</b>	P2018-ND-119 (File # 009427)
<b>Date notice received by OIPC</b>	August 9, 2018
<b>Date Organization last provided information</b>	August 9, 2018
<b>Date of decision</b>	September 4, 2018
<b>Summary of decision</b>	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).
<b>JURISDICTION</b>	
<b>Section 1(1)(i) of PIPA “organization”</b>	The Organization operates in Alberta and is an “organization” as defined in section 1(1)(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>• full name,</li><li>• address,</li><li>• date of birth,</li><li>• insurance contract reference numbers, and</li><li>• contract values.</li></ul> <p>This information is about identifiable individuals and is “personal information” as defined in section 1(1)(k) of PIPA.</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 July 27, 2018, an advisor with the Organization left a bag containing 12 insurance contracts in a locked car at her residence.</li><li>• On July 28, 2018, the advisor found the vehicle had been broken into and the bag stolen, along with a few personal items.</li></ul>

	<ul style="list-style-type: none"> <li>The breach was reported to the Organization’s Calgary Financial Centre on July 30, 2018.</li> </ul>
<b>Affected individuals</b>	The incident affected 15 individuals.
<b>Steps taken to reduce risk of harm to individuals</b>	<ul style="list-style-type: none"> <li>Reported incident to law enforcement and internally.</li> <li>Offered affected individuals a pre-paid 24-month subscription to a credit monitoring service.</li> </ul>
<b>Steps taken to notify individuals of the incident</b>	Affected individuals were notified by mail on August 7, 2018.
<b>REAL RISK OF SIGNIFICANT HARM ANALYSIS</b>	
<p><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.</p>	<p>The Organization identified the type of harm that may result from the incident as “identity theft/fraud”.</p> <p>I agree with the Organization’s assessment. The contact, identity and insurance information at issue could be used to cause the significant harms of identity theft, and fraud.</p>
<p><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.</p>	<p>The Organization reported “The harm of identity theft / fraud is a potential result from this breach of client information due to the circumstances of the incident”.</p> <p>I agree with the Organization. The breach was the result of malicious intent (vehicle break-in and theft). The Organization did not report recovering the information. Some of the affected individuals are minor children.</p>
<b>DECISION UNDER SECTION 37.1(1) OF PIPA</b>	
<p>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 in this case. The contact, identity and insurance information at issue could be used to cause the significant harms of identity theft, and fraud. The breach was the result of malicious intent (vehicle break-in and theft). The Organization did not report recovering the information. Some of the affected individuals are minor children.</p> <p>I require the Organization to notify the affected individuals in accordance with section 19.1 of the <i>Personal Information Protection Act Regulation</i> (Regulation). I understand the affected individuals were notified by mail on August 7, 2018. The Organization is not required to notify affected individuals again.</p>	

Jill Clayton  
Information and Privacy Commissioner