



**PERSONAL INFORMATION PROTECTION ACT  
Breach Notification Decision**

<b>Organization providing notice under section 34.1 of PIPA</b>	IDC Worldsource Insurance Network Inc. (Organization)
<b>Decision number (file number)</b>	P2018-ND-158 (File #010348)
<b>Date notice received by OIPC</b>	November 1, 2018
<b>Date Organization last provided information</b>	November 1, 2018
<b>Date of decision</b>	December 3, 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 whose personal information was collected in Alberta, 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 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 occurred in Alberta and involved all or some of the following information:</p> <ul style="list-style-type: none"><li>• name,</li><li>• social insurance number,</li><li>• address,</li><li>• cheque, and</li><li>• responses to health-related questions, including name of family physician and date of last doctor's visit.</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	

<p><b>Description of incident</b></p>	<ul style="list-style-type: none"> <li>• On October 4, 2018, the Organization hosted an educational event for insurance advisors at an Edmonton golf club. More than 60 advisors attended.</li> <li>• An advisor attending the event handed an employee at the event registration table a sealed envelope containing client paperwork and asked the employee to transport the paperwork to the Organization’s office. The employee left the venue after the event without taking the sealed envelope.</li> <li>• On October 15, 2018, the advisor contacted the Organization about the paperwork in the envelope. The employee realized the envelope had been left at the venue, and immediately called the venue to see if it had been found. The employee also attended at the venue to assist in a search for the envelope. The envelope was not recovered.</li> <li>• The venue advised the Organization that its policy is to shred all papers left behind at events. The shredding box is shredded between the 6th and 10th of every month, which in this case would have been between the date of the incident and the date of discovery.</li> <li>• The affected advisor provided the Organization with photocopies of the documents that were in the envelope so the Organization could validate personal information that was lost.</li> </ul>
<p><b>Affected individuals</b></p>	<p>The incident affected 8 individuals in Alberta.</p>
<p><b>Steps taken to reduce risk of harm to individuals</b></p>	<ul style="list-style-type: none"> <li>• Organization staff returned to the venue to confirm the missing envelope could not be found, and validated the venue's shredding policies.</li> <li>• Coordinated with the clients' insurance advisor to inform the affected clients (in person and by written notice) and offered to pay for the clients to use a fraud alert service for two years.</li> <li>• Reminded staff of their responsibility to exercise extra care and vigilance when handling client applications and paperwork.</li> <li>• Discussed the incident with the employee involved.</li> <li>• Reported the breach to the Office of the Privacy Commissioner of Canada.</li> </ul>
<p><b>Steps taken to notify individuals of the incident</b></p>	<p>Client meetings with affected individuals occurred October 23, 2018. Client letters were mailed October 26, 2018.</p>

<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 reported potential harms resulting from the incident include “Possibility of identity or credit theft. Little chance of public embarrassment or humiliation with respect to the health-related information, as the answers to health questions were mostly answered “no” and affirmative responses were unremarkable containing no potentially embarrassing or unusually sensitive health information.”</p> <p>In my view, identity information could be used to cause the significant harms of identity theft, financial loss and fraud. Health/medical information could potentially be used to cause hurt, humiliation or embarrassment.</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 that it “... has found no evidence of malicious intent. While we cannot be certain, we have concluded the documents were likely shredded at the venue and so the likelihood of harm is low.”</p> <p>Despite the fact the Organization does not know if the personal information was stolen or lost, in my view, a reasonable person would consider that the likelihood of harm resulting from this incident is increased because the personal information has not been recovered and its whereabouts are unknown.</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 to the affected individuals.</p> <p>Identity information could be used to cause the significant harms of identity theft, financial loss and fraud. Health/medical information could potentially be used to cause hurt, humiliation or embarrassment. Despite the fact the Organization does not know if the personal information was stolen or lost, in my view, a reasonable person would consider that the likelihood of harm resulting from this incident is increased because the personal information has not been recovered and its whereabouts are unknown.</p> <p>I require the Organization to notify the affected individuals in Alberta in accordance with section 19.1 of the <i>Personal Information Protection Act Regulation</i> (Regulation). I understand affected individuals were notified in client meetings on October 23, 2018 and client letters were mailed October 26, 2018. The Organization is not required to notify affected individuals again.</p>	

Jill Clayton  
Information and Privacy Commissioner