



**PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision**

Organization providing notice under section 34.1 of PIPA	RBC Life Insurance (RBC Life) (Organization)	
Decision number (file number)	P2019-ND-001 (File #010500)	
Date notice received by OIPC	December 13, 2018	
Date Organization last provided information	December 13, 2018	
Date of decision	January 2, 2019	
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 whose personal information was collected 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,• date of birth,• telephone number,• email address,• age,• gender,• applicant/policy number,• policy amount, and• name of medical tests being requested. <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 November 14, 2018, an individual that works for a third party supplier to the Organization (a laboratory that performs medical exams) had their vehicle vandalized and the information at issue was stolen, along with a cooler containing a specimen of blood and urine. The incident occurred in Calgary, Alberta. The incident was discovered the same day.
Affected individuals	The incident affected 3 individuals in Alberta.
Steps taken to reduce risk of harm to individuals	The Organization will provide additional training for the third party supplier.
Steps taken to notify individuals of the incident	The Organization reported “The individual that had their specimen stolen was informed of the incident by the third party supplier. We are in the process of notifying the other two impacted parties.”
REAL RISK OF SIGNIFICANT HARM ANALYSIS	
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.	The Organization reported potential harms resulting from the incident include “Humiliation and impact to relationships”. In my view, the contact, identity, medical and insurance information at issue could be used to cause the harms of identity theft and fraud. Health/medical information could potentially be used to cause hurt, humiliation or embarrassment. Email addresses could be used for phishing purposes, increasing vulnerability to fraud. These are all significant harms.
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.	The Organization reported “The data was stolen which poses a risk of harm to the impacted individuals.” In my view, a reasonable person would consider that the likelihood of harm resulting from this incident is increased because the incident resulted from malicious intent (theft). Further, the Organization did not report recovering the information.
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. The contact, identity, medical and insurance information at issue could be used to cause the harms of identity theft and fraud. Health/medical information could potentially be used to cause hurt, humiliation or embarrassment. Email addresses could be used for phishing purposes, increasing vulnerability to fraud. These are all significant harms.	

The likelihood of harm resulting from this incident is increased because the incident resulted from malicious intent (theft). Further, the Organization did not report recovering the information.

I require the Organization to notify the affected individuals whose personal information was collected in Alberta in accordance with section 19.1 of the *Personal Information Protection Act Regulation* (Regulation) and **confirm to my office in writing within 10 days of the date of this decision that it has done so.**

Jill Clayton
Information and Privacy Commissioner