



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	World Financial Group Insurance Agency of Canada Inc. (Organization)
Decision number (file number)	P2019-ND-010 (File #010424)
Date notice received by OIPC	December 6, 2018
Date Organization last provided information	January 25, 2019
Date of decision	February 4, 2019
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 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, and• account information. <p>This information is about an identifiable individual 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">• An agent's car was parked and locked in an underground parkade in Calgary, Alberta.• On November 12, 2018, the agent’s driver side window was smashed and his laptop bag was stolen from the backseat.• The breach was discovered the same day by the agent when he returned to his car and noticed the damage and the laptop stolen.

Affected individuals	The incident affected 1 individual.
Steps taken to reduce risk of harm to individuals	Reported the incident to law enforcement.
Steps taken to notify individuals of the incident	The Organization reported that the agent contacted his client “right away” and the Organization “mailed out a letter December 6, 2018”.
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 possible harms that may occur as a result of the breach include “Identity Fraud”, “Account Take Over” and “funds re-directed to a third party”. In my view, the identity and financial information at issue could be used to cause the significant harms of identity theft and fraud.
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 likelihood harm will result from this event is of medium impact as no SIN information was present on the stolen device”. 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 and did not report that the stolen laptop was encrypted.
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 individual. The identity and financial information at issue could be used to cause the significant harms of identity theft and fraud. 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 and did not report that the stolen laptop was encrypted. I require the Organization to notify the affected individual in accordance with section 19.1 of the <i>Personal Information Protection Act Regulation</i> (Regulation). I understand the affected individual was notified by the agent and the Organization mailed out a letter December 6, 2018. The Organization is not required to notify the affected individual again.	

Jill Clayton
Information and Privacy Commissioner