



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	SGI Canada Insurance Services Ltd. (Organization)
Decision number (file number)	P2019-ND-199 (File #013160)
Date notice received by OIPC	April 30, 2019
Date Organization last provided information	April 30, 2019
Date of decision	December 16, 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"	The incident involved the following information: <ul style="list-style-type: none">• name,• address,• driver's licence number,• email address. This information is about an identifiable individual and is "personal information" as defined in section 1(1)(k) of PIPA.
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 April 3, 2019 a customer of the Organization met with an adjuster from an independent adjusting firm, to provide a statement regarding an auto insurance claim file. The Organization engaged the services of an independent adjuster for this task.

	<ul style="list-style-type: none"> On April 9, 2019 the independent adjuster had her vehicle parked at a business in Calgary. The vehicle was broken into and her briefcase was stolen from the locked trunk of the car, either on the evening of April 9, 2019 or in the early hours of April 10, 2019. The information at issue was in the briefcase. The breach was discovered on April 10, 2019 by the independent adjuster. It was reported to the Organization on April 17, 2019.
Affected individuals	The incident affected 1 individual.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> Instructed the Manager to have staff advise any independent adjusters to keep any information in their possession secure at all times and to never leave it unattended. Will advise management at the independent adjusting firm of this, and instruct them that if any customer information is lost or stolen in the future, to contact the Organization immediately.
Steps taken to notify individuals of the incident	The affected individual was notified by letter on April 29, 2019.
REAL RISK OF SIGNIFICANT HARM ANALYSIS	
<p>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.</p>	<p>The Organization reported “The possible harm that may occur is identity theft”.</p> <p>In my view, a reasonable person would consider that the contact and identity information at issue could be used to cause the significant harms of identity theft and fraud.</p>
<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 “The risk of identity theft in this situation is low, given that we do not feel that this person was specifically targeted; however, in the event it should it occur the impact on the individual would be high. Therefore we feel the likelihood of harm is moderate”.</p> <p>In my view, a reasonable person would consider the likelihood of harm resulting from this incident is increased as the breach was the result of malicious intent (theft) and the information has not been recovered.</p>
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.	



A reasonable person would consider that the contact and identity information at issue could be used to cause the significant harms of identity theft and fraud. The likelihood of harm resulting from this incident is increased as the breach was the result of malicious intent (theft) and the information has not been recovered.

I require the Organization to notify the affected individual in accordance with section 19.1 of the *Personal Information Protection Act Regulation* (Regulation).

I understand the affected individual was notified by letter on April 29, 2019. The Organization is not required to notify the affected individual again.

Jill Clayton
Information and Privacy Commissioner