



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

<b>Organization providing notice under section 34.1 of PIPA</b>	The Canada Life Assurance Company (Organization)
<b>Decision number (file number)</b>	P2020-ND-029 (File #014019)
<b>Date notice received by OIPC</b>	November 29, 2019
<b>Date Organization last provided information</b>	February 14, 2020
<b>Date of decision</b>	March 4, 2020
<b>Summary of decision</b>	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).
<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 involved all or some of the following information:</p> <ul style="list-style-type: none"><li>• name,</li><li>• address,</li><li>• telephone number,</li><li>• bank account information (bank name, account number, address), and</li><li>• account holder signature.</li></ul> <p>This information is about an identifiable individual 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 November 4, 2019, the Organization contacted a residential tenant regarding her parking rent.</li><li>• The individual advised the Organization that she had personally delivered the documents to the Organization’s office on October 18, 2019.</li></ul>

	<ul style="list-style-type: none"> <li>The Organization searched for the documents but has been unable to locate them.</li> </ul>
<b>Affected individuals</b>	The incident affected one (1) individual.
<b>Steps taken to reduce risk of harm to individuals</b>	<ul style="list-style-type: none"> <li>Searched the office.</li> <li>Provided information regarding notifying a credit reporting agency.</li> </ul>
<b>Steps taken to notify individuals of the incident</b>	The affected individual was notified by letter on November 6, 2019.
<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 “There is a real risk of identity theft to the affected individual.”</p> <p>I accept the Organization’s assessment. A reasonable person would consider that the contact and financial 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 that “The documents are missing, and although it is possible they remain in the office where they were dropped off, we are unable to locate them and therefore unable to determine where the contract is and who may have had access to it.”</p> <p>A reasonable person would consider that the likelihood of harm resulting from this incident is increased because the documents containing the personal information were lost and the Organization has not been able to determine what happened to them. The documents have not been recovered.</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 individual.</p> <p>A reasonable person would consider that the contact and financial 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 because the documents containing the personal information were lost and the Organization has not been able to determine what happened to them. The documents have not been recovered.</p>	

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

I understand the Organization notified the affected individual in letter dated November 6, 2019 in accordance with the Regulation. The Organization is not required to notify the affected individual again.

Jill Clayton  
Information and Privacy Commissioner