



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	ivari (Organization)
Decision number (file number)	P2020-ND-043 (File #015120)
Date notice received by OIPC	June 5, 2019
Date Organization last provided information	June 5, 2019
Date of decision	May 1, 2020
Summary of decision	There is a real risk of significant harm to the individuals affected by this incident. The Organization is required to notify 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"	The incident involved a copy of a passport or driver's license. The information is about identifiable individuals and is "personal information" as defined in section 1(1)(k) of PIPA. To the extent the information was collected in Alberta, PIPA applies.
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 17, 2019, an insurance advisor's car was broken into and a laptop was stolen. The information at issue was stored on the laptop.• The incident was discovered the same day.• The laptop was password protected.
Affected individuals	The incident affected 18 individuals, including one individual in Alberta.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none">• Reported theft to law enforcement and building security.• Changed passwords (for laptop and carrier portals).

	<ul style="list-style-type: none"> Working with the advisor and Managing General Agency office to augment accountability under privacy legislation.
Steps taken to notify individuals of the incident	The affected individuals were notified on June 5, 2019 by letter.
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 that the potential harm(s) that might result from the incident include “Identity theft” and “financial loss”.</p> <p>In my view, a reasonable person would consider that the 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:</p> <p style="text-align: center;"><i>Our assessment to the likelihood the lost information will cause harm to the individuals is low due to the fact we don't believe the personal sensitive information was the target of the break in. The laptop was password protected, in addition passwords have been changed and clients notified to monitor their financial accounts for unusual activity.</i></p> <p>In my view, a reasonable person would consider that the likelihood of harm resulting from this incident is increased as it was the result of malicious intent (break-in and theft of laptop). The laptop has not been recovered. The Organization can only speculate as to the motive of the thief.</p>
DECISION UNDER SECTION 37.1(1) OF PIPA	
<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>A reasonable person would consider that the 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 it was the result of malicious intent (break-in and theft of laptop). The laptop has not been recovered. The Organization can only speculate as to the motive of the thief.</p> <p>I require the Organization to notify affected individuals whose person information was collected in Alberta, in accordance with section 19.1 of the <i>Personal Information Protection Act Regulation</i> (Regulation).</p>	

I understand the affected individuals were notified on June 5, 2019 by letter. The Organization is not required to notify affected individuals again.

Jill Clayton
Information and Privacy Commissioner