



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	iA Financial Group (Organization)
Decision number (file number)	P2020-ND-047 (File #015670)
Date notice received by OIPC	April 9, 2020
Date Organization last provided information	April 9, 2020
Date of decision	May 19, 2020
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 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,• social insurance number,• contract information, and• pre-authorized debit form. <p>The 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">• On February 20, 2020, a vehicle belonging to an insurance agent working with the Organization was broken into.• A laptop that stored client information was stolen.• The breach was reported to the Organization on February 21, 2020.

Affected individuals	The incident affected 1 individual.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> Added a note on the customer file of the affected individual to ensure no unauthorized access. Increased identification security measures. Offered the affected individual a subscription to credit monitoring services. Sent a compliance warning letter to the agent, reiterating the importance to keep client information safe.
Steps taken to notify individuals of the incident	The affected individual was notified by letter on May 3, 2020.
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.	<p>The Organization reported the possible harm(s) that might result from the breach was "Identity theft".</p> <p>In my view, a reasonable person would consider that the contact, identity and financial information at issue could be used to cause the significant harms of identity theft and fraud.</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>The Organization reported "There was malicious intent in the theft of the laptop and assuming the person who stole the laptop is able to unlock the password, there is a reasonable possibility that this [sic] breach could result in harm to the individual".</p> <p>In my view, a reasonable person would consider that the likelihood of harm resulting from this incident is increased as the breach resulted from theft. The laptop was not encrypted and has not been recovered.</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 individual.</p> <p>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 resulted from theft. The laptop was not encrypted and has not been recovered.</p> <p>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).</p>	

I understand the affected individual was notified by letter on May 3, 2020. The Organization is not required to notify the affected individual again.

Jill Clayton
Information and Privacy Commissioner