



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Industrial Alliance Insurance and Financial Services Inc. (Organization)
Decision number (file number)	P2020-ND-072 (File # 015165)
Date notice received by OIPC	July 19, 2019
Date Organization last provided information	July 19, 2019
Date of decision	July 16, 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 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,• insurance contract specifications and declaration of insurability. <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">• On May 27, 2019, an insurance broker's briefcase, which included an insurance policy contract with personal information, was stolen.• The breach was discovered the same day. The broker reported the theft to the company.

Affected individuals	The incident affected 1 individual.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> • The affected individual was offered credit monitoring. • A notice was put on the client file and additional measures to verify the identity of the individual were put in place.
Steps taken to notify individuals of the incident	The affected individual was notified by letter on May 29, 2019.
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 possible harm(s) included “Identity theft”.</p> <p>In my view, a reasonable person would consider the contact, identity and insurance 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 stealing the briefcase, therefore there is a possibility that the information will be used for identity theft or another way that is harmful to the individual.”</p> <p>In my view, a reasonable person would consider that the likelihood of harm resulting from this incident is increased because the breach resulted from malicious action (theft). The Organization did not report recovering the information.</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 the contact, identity and insurance 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 breach resulted from malicious action (theft). The Organization did not report recovering the information.</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). I understand the affected individual was notified on May 29, 2019. The Organization is not required to notify the affected individual again.</p>	

Jill Clayton
Information and Privacy Commissioner