



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	World Financial Group Canada Inc. (Organization)
Decision number (file number)	P2021-ND-119 (File #013811)
Date notice received by OIPC	November 12, 2019
Date Organization last provided information	November 12, 2019
Date of decision	April 27, 2021
Summary of decision	There is a real risk of significant harm to the individuals affected by this incident. The Organization is required to notify the 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”	<p>The incident involved the following information:</p> <ul style="list-style-type: none">• name,• date of birth,• address,• social insurance number,• banking information,• photo ID,• financial information,• medical/health information, and• account information. <p>This 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.</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 October 10, 2019, a password protected laptop containing client information was stolen from a locked vehicle. The breach was discovered the same day when the vehicle owner discovered that the back window of her locked vehicle was shattered and items including the password protected laptop were missing.
Affected individuals	The incident affected 108 individuals, including 12 in Alberta.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> Reported incident to the Privacy Officer. Notified insurance providers and fund companies. Working with staff and advisors to remind them of the importance of being diligent in keeping belongings containing client information safe to help prevent future breaches.
Steps taken to notify individuals of the incident	Affected individuals were notified by letter on October 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(s) that might result from the incident include “Identity Fraud”, “Account Take Over” and “Funds Re-Directed to a Third Party”.</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 harms of identity theft and fraud. Medical/health information could be used to cause hurt, humiliation and embarrassment. These are all significant harms.</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 likelihood of harm that will result in this event is of medium impact because the approved person believes that the theft occurred with the intention to wipe the laptop and resell it with no interest in the information on the laptop. However, given the type of information that was on the laptop itself [sic], if the intent was to obtain personal information and use it for fraudulent purposes then the likelihood of harm is high”.</p> <p>In my view, a reasonable person would consider the likelihood of harm resulting from this incident is increased because the breach is the result of malicious intent (vehicle break-in and theft). The Organization did not report that the laptop was encrypted or recovered, and can only speculate as to the motives of the thief.</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 individuals.

A reasonable person would consider that the contact, identity, and financial information at issue could be used to cause the harms of identity theft and fraud. Medical/health information could be used to cause hurt, humiliation and embarrassment. These are all significant harms.

The likelihood of harm resulting from this incident is increased because the breach is the result of malicious intent (vehicle break-in and theft). The Organization did not report that the laptop was encrypted or recovered, and can only speculate as to the motives of the thief.

I require the Organization to notify the affected individuals whose personal information was collected in Alberta, in accordance with section 19.1 of the *Personal Information Protection Act Regulation* (Regulation).

I understand affected individuals were notified by letter on October 29, 2019. The Organization is not required to notify the affected individuals again.

Jill Clayton
Information and Privacy Commissioner