



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	The Canada Life Insurance Company (Organization)
Decision number (file number)	P2021-ND-141 (File #017346)
Date notice received by OIPC	September 22, 2020
Date Organization last provided information	May 3, 2021
Date of decision	May 25, 2021
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 some or all of the following information:</p> <ul style="list-style-type: none">• name,• policy number,• age,• mailing address,• plan type,• beneficiary information,• social insurance number, and• coverage information. <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 January 6, 2020, an insurance contract is believed to have been sent from the Organization’s London, Ontario office. On April 30, 2020, the Organization discovered the loss of the contract when it was reported that the contract never arrived and has not been returned to the Organization undelivered.
Affected individuals	The incident affected 1 Alberta resident.
Steps taken to reduce risk of harm to individuals	Enhanced tracking and audit of contract package delivery.
Steps taken to notify individuals of the incident	The affected individual was notified by letter on May 29, 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.	The Organization reported “There is one impacted individual for whom there may be a Real Risk of Significant Harm...”. In my view, a reasonable person would consider that the contact, identity and insurance information at issue could be used to cause the significant harms of identity theft and fraud.
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.	The Organization did not specifically provide an assessment of the likelihood that significant harm would result from this incident. In my view, a reasonable person would consider the likelihood of significant harm resulting in this case is increased because the Organization does not know the cause (theft or misplaced/lost), and the contract package has not been recovered.
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, identity and insurance information at issue could be used to cause the significant harms of identity theft and fraud. The likelihood of significant harm resulting in this case is increased because the Organization does not know the cause (theft or misplaced/lost), and the contract package has not been recovered.</p> <p>The Organization is required 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 29, 2020. The Organization is not required to notify the affected individual again.

Jill Clayton
Information and Privacy Commissioner