



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

Organization providing notice under section 34.1 of PIPA	Canada Life Assurance Company (Organization)
Decision number (file number)	P2022-ND-074 (File #023181)
Date notice received by OIPC	August 31, 2021
Date Organization last provided information	August 16, 2022
Date of decision	January 10, 2023
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 all or some of the following information:</p> <ul style="list-style-type: none">• name,• address,• policy number,• social insurance number, and• other financial 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">• Duplicate RRSP receipt information was requested through the Organization’s Customer Service network during the month of March. The printed copy of this duplicate was to be sent to the

	<p>Organization’s Tax Reporting team on March 24, 2021, from the Organization’s print services.</p> <ul style="list-style-type: none"> • The printed RRSP receipts did not arrive on March 25, 2021. • Despite several searches, the receipts have not been recovered.
Affected individuals	The incident affected 8 individuals in Alberta.
Steps taken to reduce risk of harm to individuals	<ul style="list-style-type: none"> • Conducted searches to locate the missing information. • Actively establishing protocols for tracking printed receipts. • Offered reimbursement to all impacted individuals of one year of credit monitoring and reporting services.
Steps taken to notify individuals of the incident	The affected individuals were notified by letter on August 11, 2021.
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 did not provide an assessment of the likelihood of harm in its report. However, the Organization recommended in its notification that the affected individuals “<i>Notify Credit Reporting Agencies</i>” ... “<i>Notify Financial Institutions</i>” ... and “<i>Report Suspicious Activity</i>”.</p> <p>In my view, a reasonable person would consider that the contact, identity and financial information could be used to cause the significant harms of identity theft, financial loss 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><i>Although we have determined the likelihood of the receipts being lost outside the organization is very low if not impossible, given mail processing and the closed loop of our dedicated courier system between our offices, we have not been able to locate the missing box of RRSP receipts.</i></p> <p>In my view, a reasonable person would consider the likelihood of significant harm resulting in this case is increased because the documents have 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 individuals.</p> <p>The contact, identity and financial information could be used to cause the significant harms of identity theft, financial loss and fraud.</p>	

The likelihood of significant harm resulting in this case is increased because the documents have not been recovered.

The Organization is required 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 the affected individuals were notified by letter on August 31, 2021. The Organization is not required to notify the affected individuals again.

Cara-Lynn Stelmack
Assistant Commissioner, Operations and Compliance