



**PERSONAL INFORMATION PROTECTION ACT**  
**Breach Notification Decision**

<b>Organization providing notice under section 34.1 of PIPA</b>	Primerica Life Insurance Company of Canada (Organization)
<b>Decision number (file number)</b>	P2022-ND-078 (File #023186)
<b>Date notice received by OIPC</b>	September 22, 2021
<b>Date Organization last provided information</b>	September 22, 2021
<b>Date of decision</b>	January 10, 2023
<b>Summary of decision</b>	There is a real risk of significant harm to the individuals affected by this incident. The Organization is required to notify the individuals pursuant to section 37.1 of the <i>Personal Information Protection Act</i> (PIPA).
<b>JURISDICTION</b>	
<b>Section 1(1)(i) of PIPA “organization”</b>	The Organization is an “organization” as defined in section 1(1)(i) of PIPA.
<b>Section 1(1)(k) of PIPA “personal information”</b>	<p>The incident involved all or some of the following information:</p> <ul style="list-style-type: none"><li>• name,</li><li>• address,</li><li>• date of birth, and</li><li>• driver’s license number.</li></ul> <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>
<b>DESCRIPTION OF INCIDENT</b>	
<input checked="" type="checkbox"/> loss <input type="checkbox"/> unauthorized access <input type="checkbox"/> unauthorized disclosure	
<b>Description of incident</b>	<ul style="list-style-type: none"><li>• Sometime between July 16, 2021, and September 2, 2021, medical kits containing vitals, blood and urine were collected from the Organization’s clients for the purposes of applying for an insurance policy.</li><li>• The paramedical vendor that the Organization used, couriered the medical kits to the lab; however, the courier misplaced the kits in transit.</li></ul>

	<ul style="list-style-type: none"> <li>The courier has not been able to locate the kits. The kits are assumed missing.</li> </ul>
<b>Affected individuals</b>	The incident affected 3 individuals in Alberta.
<b>Steps taken to reduce risk of harm to individuals</b>	<ul style="list-style-type: none"> <li>Advised affected individuals to contact their financial institution and consumer-reporting agency.</li> <li>Offered complimentary credit monitoring protection for a period of two years as a way to mitigate the risk of harm.</li> <li>Advised the courier to take better care in the delivery of its products, especially sensitive items that contain personal identifiable information.</li> </ul>
<b>Steps taken to notify individuals of the incident</b>	The affected individuals were notified by letter on September 20, 2021.
<b>REAL RISK OF SIGNIFICANT HARM ANALYSIS</b>	
<b>Harm</b> 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,  <i>The kits contain personal identifiable information about the affected clients, which could result in identify theft and financial fraud.</i>  I agree with the Organization’s assessment. A reasonable person would consider that the contact and identity information at issue could be used to cause the harms of identity theft and fraud.
<b>Real Risk</b> 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 reported,  <i>This incident presents a real risk of significant harmto (sic) the affected clients as this incident occurred as a result of the misplacement of medical lab kits that contain persoanl (sic) identifiable information.</i>  In my view, a reasonable person would consider the likelihood of harm resulting is increased because the medical kits containing the personal information are missing and have not been found.
<b>DECISION UNDER SECTION 37.1(1) OF PIPA</b>	
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.  Contact and identity information at issue could be used to cause the harms of identity theft and fraud.  The likelihood of harm resulting is increased because the medical kits containing the personal information are missing and have not been found.	

I require the Organization to notify the affected individuals in accordance with section 19.1 of the *Personal Information Protection Act Regulation* (Regulation).

I understand the affected individuals were notified by letter on September 20, 2021, in accordance with the Regulation. The Organization is not required to notify the individuals again.

Cara-Lynn Stelmack  
Assistant Commissioner, Operations and Compliance