



PERSONAL INFORMATION PROTECTION ACT
Breach Notification Decision

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| Organization providing notice under section 34.1 of PIPA | London Life Insurance Company (Organization) |
| Decision number (file number) | P2020-ND-045 (File #015076) |
| Date notice received by OIPC | June 10, 2019 |
| Date Organization last provided information | June 10, 2019 |
| Date of decision | May 1, 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,• bank account details, and• medical information. <p>The 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 April 9, 2019, a completed insurance application was mailed from an advisor's office in Edson to the Organization’s Financial Centre in Edmonton. |

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| | <ul style="list-style-type: none"> • The application was sent by regular Canada Post mail rather than courier (tracked/signature required). • The Financial Centre did not receive the application. • The incident was discovered on May 22, 2019 when the advisor followed up regarding the underwriting of the policy and there was no record of the application being submitted. |
| Affected individuals | The incident affected 1 individual. |
| Steps taken to reduce risk of harm to individuals | <ul style="list-style-type: none"> • Conducted a thorough search of the Financial Office. • Added special handling to the client's account to actively monitor requests related to the account. • Offered one year of credit monitoring. • Reminded the advisor to use registered mail or courier with signature when mailing client's personal information. • Advisor will review Code of Conduct sections on policy delivery and the handling of applications. |
| Steps taken to notify individuals of the incident | The affected individual was notified verbally and by letter on May 22, 2019. |

REAL RISK OF SIGNIFICANT HARM ANALYSIS

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| 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 "The information involved in this incident can be used to cause the harms of identity theft and fraud, and humiliation and embarrassment".</p> <p>In my view, a reasonable person would consider that the contact, identity, financial and medical information at issue could be used to cause the significant harms of identity theft and fraud, as well as hurt, humiliation and embarrassment.</p> |
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| 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 "Although this incident is not due to malicious intent, we are unable to determine where the application is, therefore there is a likelihood that identity theft and fraud could result".</p> <p>In my view, a reasonable person would consider that the likelihood of harm resulting from this incident is increased as the whereabouts of the information is unknown.</p> |
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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 individual.

A reasonable person would consider that the contact, identity, financial and medical information at issue could be used to cause the significant harms of identity theft and fraud, as well as hurt,

humiliation and embarrassment. The likelihood of harm resulting from this incident is increased as the whereabouts of the information is unknown.

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

I understand the affected individual was notified verbally and by letter on May 22, 2019. The Organization is not required to notify the affected individual again.

Jill Clayton
Information and Privacy Commissioner