



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

<b>Organization providing notice under section 34.1 of PIPA</b>	World Financial Group Insurance Agency of Canada Inc. (Organization)
<b>Decision number (file number)</b>	P2022-ND-068 (File #023109)
<b>Date notice received by OIPC</b>	June 16, 2021
<b>Date Organization last provided information</b>	June 16, 2021
<b>Date of decision</b>	December 23, 2022
<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 those 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>• date of birth,</li><li>• address,</li><li>• phone number,</li><li>• email address,</li><li>• social insurance numbers, and</li><li>• photocopies of client’s driver’s licence.</li></ul> <p>This information is about identifiable individuals and is “personal information” as defined in section 1(1)(k) of PIPA.</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>• On June 1, 2021, a branch office of the Organization was broken into.</li><li>• The break-in was reported to the police.</li></ul>

	<ul style="list-style-type: none"> <li>An agent with the Organization had her double password protected laptop stolen from her locked office during the break in.</li> <li>The breach was discovered on June 2, 2021 when the agent went to the branch office.</li> </ul>
<b>Affected individuals</b>	The incident affected approximately 16 individuals whose information was collected in Alberta.
<b>Steps taken to reduce risk of harm to individuals</b>	<ul style="list-style-type: none"> <li>Reported break-in to the police.</li> <li>Remotely changed the two passwords needed to gain access to the laptop and remotely locked the computer.</li> <li>Stored client files in password protected cloud service.</li> <li>Changed all the passwords to all work related logins.</li> </ul>
<b>Steps taken to notify individuals of the incident</b>	Affected individuals were notified by email on June 22, 2021.
<b>REAL RISK OF SIGNIFICANT HARM ANALYSIS</b>	
<p><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.</p>	<p>The Organization reported,</p> <p><i>Possible harms that may come to the clients - identity (sic) theft, fraud, loss to reputation</i></p> <p>In my view, a reasonable person would consider the contact and identity at issue could be used to cause the harms of identity theft and fraud. These are significant harms.</p>
<p><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.</p>	<p>The Organization reported,</p> <p><i>WFG has assess (sic) the likelihood of harm resulting from this incident to be low. The individuals who broke into the branch office was likely only interested in stealing items of value.</i></p> <p>In my view, a reasonable person would consider that the likelihood of harm resulting from this incident is increased, as it was the result of malicious intent (break-in). The Organization can only speculate as to the motives of the thief. The laptop was password protected, but the Organization did not report that it was encrypted.</p>
<b>DECISION UNDER SECTION 37.1(1) OF PIPA</b>	
<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>In my view, a reasonable person would consider the contact and identity at issue could be used to cause the harms of identity theft and fraud. These are significant harms. A reasonable person would</p>	

consider that the likelihood of harm resulting from this incident is increased, as it was the result of malicious intent (break-in). The Organization can only speculate as to the motives of the thief. The laptop was password protected, but the Organization did not report that it was encrypted.

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 email on June 22, 2021. The Organization is not required to notify the individuals again.

Cara-Lynn Stelmack  
Assistant Commissioner, Operations and Compliance