

TO: MEMBERS OF THE FACILITY ASSOCIATION

ATTENTION: CHIEF EXECUTIVE OFFICER

BULLETIN NO.: F2020 – 090

DATE: DECEMBER 8, 2020

**SUBJECT: UIP Data, Office of the Privacy Commissioner, and AutoPlus
– Limiting Access to Individual’s Historical Data**

Please forward a copy of this bulletin to your Chief Underwriting Officer.

The following is relevant to **FA Member Companies who use CGI’s Insurance Information Services (IIS) to access policy and claims history as delivered in CGI IIS’ AutoPlus product.** Member Companies who do not use the CGI IIS’ AutoPlus product are not required to respond.

In order to address the issue described below, Facility Association and CGI IIS are **requesting Member Companies who use the AutoPlus product provide an individual** Single Point of Contact (SPOC) to work with CGI, **by December 18th, 2020**, to help define “user access roles” **to limit the requested years of history made available in the AutoPlus** to individual users. CGI will provide your SPOC with a Company user listing and guidance on defining “user roles”; required years and categorization. The SPOC would need to liaise with internal resources to determine the number of years of data required by user role based on their purpose of use.

Background

A privacy complaint was filed with the **Office of the Privacy Commissioner of Canada (OPC)** in relation to certain historical policy and claims data made available to insurance company underwriters through CGI’s **AutoPlus** reports – where each report provides the full policy and claims history (up to 25 years) for the requested driver. Specifically, the complaint focused on historical personal data being provided through the report which was not being used for rating purposes. In its role as Underwriting Information Plan (UIP) data controller, the Facility Association (FA) has been required to be involved. The OPC, has determined that the privacy concern is not specifically in relation to data retention, but is instead focused on situational access to data history. Following consultation and discussion with both the OPC and CGI, a resolution to the issue has been established. The OPC has required the solution be in place by March 31, 2021.

To satisfy OPC concerns, CGI has proposed an adjustment to the AutoPlus interface, leveraging existing self-administration functionality. CGI proposes the addition of a “user role” which would limit the requested years of history (versus the current default full history being provided), i.e.

allowing users of the report to request the needed historical information for their purpose rather than automatically providing the full 25-year history.

AutoPlus user request – CGI

CGI IIS requires clients who use the product to identify a Single Point of Contact (SPOC) to work with CGI to adjust users’ access so as to receive only the number of years of data required based on their purpose of use. While several areas of your organization may have access to CGI IIS’ AutoPlus product, it is recommended that a single point person or lead department coordinate communication with CGI in this matter (SPOC).

- The individual identified should send an email to CGI at autoplus@cgi.com with a subject line of “**AutoPlus # of years of data**” to identify themselves as the SPOC.
- Once identified, CGI will contact the individual to provide further details about your organization’s current user population set up and help to guide the SPOC with what is required of them.
- It is important that the SPOC contact CGI via the mailbox above as soon as possible and **no later than December 18, 2020** to start this process.
- Upon the SPOC’s completion of the current user population review, they will be required to respond to CGI with the required changes as soon as possible and **no later than January 28, 2021**. This will enable CGI to assess the required changes for each user population and to enable, if required, self-administration services for the SPOC and/or identified self-administrators to be trained.
- Self-administrators will, if necessary, be required to complete the required changes to your user populations **no later than March 31, 2021**.

Should you require any further information, please contact Aidan Chen at achen@facilityassociation.com or at (647) 619-2965.

Saskia Matheson
President & CEO