



Office of the  
Saskatchewan Information  
and Privacy Commissioner

## **REVIEW REPORT 240-2025**

### **Saskatchewan Government Insurance**

**June 9, 2026**

#### **Summary:**

The Applicant submitted an access to information request to Saskatchewan Government Insurance (SGI) for all records related to an accident that was reported under the Applicant's name by their employer.

SGI provided full access to four audio recordings and partial access to 17 pages of responsive records. SGI withheld portions pursuant to section 29(1) (third party personal information) of *The Freedom of Information and Protection of Privacy Act (FOIP)*.

The Applicant requested a review by the Office of the Saskatchewan Information and Privacy Commissioner (OIPC).

The Commissioner found that SGI did not properly apply section 29(1) of *FOIP* to the name, address and customer number in the record.

The Commissioner recommended that SGI release the name, address and customer number of the third party to the Applicant within 30 days of issuance of this Report.

#### **I BACKGROUND**

[1] On August 15, 2025, the Applicant submitted the following access to information request to Saskatchewan Government Insurance (SGI), for responsive records for the timeframe December 19, 2024 to June 16, 2025:

All accident reports, third party statement, eyewitness statements and the name and address of the third party for an accident I have been assessed at being at

fault for, claim number [claim number]<sup>1</sup>. My driver's licence number is [driver's licence number].

[2] The following background information was provided by SGI:

To provide context for the applicant's request: a third-party witness reported that a vehicle owned by [Applicant's Employer] struck a parked vehicle. The owner of the parked vehicle made a claim for damages based on the witness's information so SGI reached out to the [Applicant's Employer] for information on whether a vehicle was operating in the area at the time of the collision and who would have been operating the vehicle. [Applicant's Employer] provided logs that indicated the applicant was the operator of the vehicle. They were included in the records released to the applicant at P011-P017. The applicant does not own the vehicle and [Applicant's Employer] has not made a claim for damages to the vehicle. However, the applicant will have received demerit points for the accident.

[3] On August 27, 2025, SGI provided a section 7 decision letter along with four audio recordings provided in full on a disc. SGI also released a 17-page document to the Applicant, explaining that three items on page 4 of the document were withheld under section 29(1) of *The Freedom of Information and Protection of Privacy Act (FOIP)*.<sup>2</sup>

[4] On September 23, 2025, the Applicant requested a review by the Office of the Saskatchewan Information and Privacy Commissioner (OIPC).

[5] On February 17, 2026, OIPC notified SGI and the Applicant that a review of the decision by SGI to withhold the three items on page 4 under section 29(1) of *FOIP* would commence. OIPC requested that SGI provide an unredacted copy of the document in issue, and an index by March 19, 2026. Both parties were invited to provide submissions by April 20, 2026.

[6] On March 16, 2026, SGI provided the index and the document to OIPC. SGI did not wish to share the index with the Applicant.

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<sup>1</sup> This office placed words in square brackets to protect the identity of the Applicant.

<sup>2</sup> [\*The Freedom of Information and Protection of Privacy Act\*](#), SS 1990-91, c. F-22.01, as amended.

[7] On April 20, 2026, SGI requested an extension for the filing of its submission. This office granted an extension until April 23, 2026. SGI provided the submission to OIPC on that date. SGI did not provide permission to share the submission with the Applicant.

[8] The Applicant did not provide a formal submission but provided a reason for the review in an email to this office which is discussed later in this Report.

## II RECORDS AT ISSUE

[9] The responsive record is a 17-page document. SGI withheld three items of third party information from the Applicant. These items are the focus of this review: the name, address and customer number (driver's licence number), of the third party owner of the parked vehicle. These three data elements were all contained on page 4 of the 17-page document and were withheld pursuant to the exemption in section 29(1) of *FOIP*. The remainder of the pages, along with four audio recordings, were released to the Applicant in full.

## III DISCUSSION OF THE ISSUES

### 1. Jurisdiction

[10] SGI qualifies as a "government institution" as defined by section 2(1)(d)(ii) of *FOIP* and is listed as a prescribed body under section 3, PART I of the Appendix to *The Freedom of Information and Protection of Privacy Regulations (FOIP Regulations)*.<sup>3</sup>

### 2. Did SGI properly apply section 29(1) of *FOIP*?

[11] Section 29(1) of *FOIP* provides:

#### **Disclosure of personal information**

**29(1)** No government institution shall disclose personal information in its possession or under its control without the consent, given in the prescribed

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<sup>3</sup> [The Freedom of Information and Protection of Privacy Regulations](#), c. F-22.01 Reg 1 (April 1, 1992), as amended.

manner, of the individual to whom the information relates except in accordance with this section or section 30.

[12] Section 29(1) of *FOIP* is a mandatory exemption. Prior to a consideration of section 29(1) of *FOIP*, the first consideration must be whether the information qualifies as “personal information” as defined by section 24(1) of *FOIP*. In order for information to be “personal information”, it must be (1) about an identifiable individual; and (2) be personal in nature.<sup>4</sup>

[13] Based on the data elements that were withheld in this matter, the following must be considered:

**24(1)** Subject to subsections (1.1) and (2), “**personal information**” means personal information about an identifiable individual that is recorded in any form, and includes:

...

(d) any identifying number, symbol or other particular assigned to the individual, other than the individual’s health services number as defined in *The Health Information Protection Act*;

(e) the home or business address, home or business telephone number or fingerprints of the individual;

...

(k) the name of the individual where:

(i) it appears with other personal information that relates to the individual; or

[14] However, section 24(2) of *FOIP* carves out certain types of information from the definition of personal information. Specifically, section 24(2)(e) of *FOIP* provides:

**24(2)** “Personal information” does not include information that discloses:

...

(e) details of a licence, permit or other similar discretionary benefit granted to an individual by a government institution;

[Emphasis added]

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<sup>4</sup> OIPC [Review Report 199-2025](#) at paragraph [46].

- [15] In the submission, SGI argued against a blanket approach to section 24(2)(e) of *FOIP*. SGI confirmed that in limited circumstances it may release the names and addresses of registered owners, but failed to explain why it would not in this instance:

SGI is aware that per s.24(2)(e) of *The Freedom of Information and Protection of Privacy Act* (“...FOIP”), a driver’s name, address and customer number are details of a licence and are not personal information. However, SGI submits that a blanket approach to s. 24(2)(e) of FOIP causes privacy concerns that do not consider the interest of the person who is identified by the information. That is why SGI chose to redact the information in its response to the applicant’s request under s. 29(1).

As legislation, FOIP and its regulations, *The Freedom of Information and Protection of Privacy Regulations* (the “Regulations”) exist to provide access to information **and** protect privacy. The issue for this submission is whether it is appropriate for a government institution to release information about an individual who is a third party to a dispute, or should their privacy be protected.

...

...SGI has continued to share the name and address of registered owners in limited circumstances, but still information which requires protections as it is easily combined with other information to reveal personal information and SGI is collecting it for specific purposes and not to create a public registry. SGI finds it relevant that legislature found it appropriate to include s.29(2)(u) of FOIP and s.17 of the Regulations even if they are superseded by s. 24(2)(e) and considers those sections when applying discretion.

[Emphasis in original]

- [16] In an email to OIPC on November 25, 2025, the Applicant provided a reason for requesting the information in question:

...

The information provided by SGI is insufficient for going to Small Claims Court to prove that I was not responsible for this accident.

...

The adjustor informed me that I could not take my case to Small Claims Court because there wasn’t any damage to the vehicle I was driving (and there wasn’t any damage to my vehicle, because I wasn’t involved in an accident). The only way to appeal SGI’s determination of fault in an accident is to go to Small Claims Court. My argument is that I was wrongly identified as the driver in this accident and need a copy of the other party's accident report and all of the information from the accident report that my manager filed on December 24,

2024 under my name, using my personal information such as drivers license number and cell phone number, without my knowledge. I also need contact information for the other party in order to file a claim with Small Claims Court.

[Emphasis added]

[17] This office has historically found that the name and address of a person in whose name a vehicle is registered does not qualify as “personal information” as defined by section 24(1)(k) of *FOIP* because this information qualifies as information *about a vehicle rather* than information about an individual within the meaning of *FOIP*.<sup>5</sup> The details of a licence or permit do not contemplate release of core personal data that one provides in confidence. A practical approach is recommended when issues of interpretation of *FOIP* apply, and section 24(2)(e) of *FOIP* distinctly mandates that details of a licence are excluded from the operation of section 24(1) of *FOIP*.

[18] This office also notes the reason for the access to information request. The Applicant has indicated that the driving force behind the access to information request is a desire to pursue an appeal of the SGI finding of fault in the Small Claims Court of Saskatchewan. The Applicant met with an adjuster and was informed of the need for the requested information. The Applicant has a window of two years from the date of the alleged collision in order to launch these proceedings. The information that is being requested in this matter qualifies as similar information sought by other citizens of Saskatchewan who wish to pursue valid legal proceedings in the Small Claims court. We can see no identifiable abuse associated with this request.

[19] The centralized database for vehicle registration does not differ from a land registry or personal property security registry. A search to ascertain the name and address in the land registry or personal property security registry does not offend any reasonable expectation of privacy for the purposes of a potential party in a potential proceeding. The Saskatchewan Court of Appeal has explained that the Legislature did not intend to impede litigation by denying a prospective litigant essential information concerning the ownership of a motor vehicle for the purposes of launching civil proceedings. The primary threshold issue in

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<sup>5</sup> OIPC [Review Report 126-2024](#) at paragraphs [23] to [25].

*General Motors Acceptance Corp. of Canada v Saskatchewan Government Insurance* is the same as the matter at hand, thus removing a need to comment on the combined effect of section 29(2) and section 17 of the Regulations.<sup>6</sup>

[20] In another matter, SGI was ordered to release the name, address and Vehicle Identification Number of the last registered owner of a 1967 Chevrolet Corvette to an applicant so that he could quiet the title to his vehicle by means of legal proceedings. The goal was a declaration with respect to the authenticity of the vehicle. The Saskatchewan Queen's Bench ordered the information released and noted:<sup>7</sup>

[34] The "details of a license" thus include the name, address and description of the vehicle being licensed, which includes a VIN. By virtue of s.24(2) of the Act, this information is not considered personal information and does not require protection...

[35] A license plate and a VIN are equivalent avenues by which to identify a vehicle and seek information regarding its owner. Neither a license plate nor a VIN is, in itself, afforded any level of privacy or protection and is equally available to one who observes any vehicle.

[21] SGI issues customer numbers to individuals when they first enter into a relationship with SGI, for example, when applying for a driver's licence. A customer number is *not* considered personal information under *FOIP* because it qualifies as "the details of a licence...granted to an individual by a government institution".<sup>8</sup>

[22] In conclusion, the information being sought is not personal information. There is no privacy concern or need for SGI to continue to withhold the name, address and customer number of the third party from the Applicant.

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<sup>6</sup> [\*General Motors Acceptance Corp. of Canada v. Saskatchewan Government Insurance\*](#), 1993 CanLII 9128 (Sask CA).

<sup>7</sup> [\*Shook Legal, Ltd. on behalf of Robert A Bonanno v Saskatchewan Government Insurance\*](#), 2018 SKQB 238 at paragraphs [34] and [35].

<sup>8</sup> OIPC [Investigation Report 096-2018](#) at paragraphs [14] and [15]. See also OIPC [Review Report 146-2017](#) at paragraph [34].

#### **IV FINDINGS**

[23] OIPC has jurisdiction to undertake this review under PART VII of *FOIP*.

[24] SGI did not properly apply section 29(1) of *FOIP* to the name, address and customer number of the third party on page 4 of the 17-page document.

#### **V RECOMMENDATION**

[25] I recommend that, within 30 days of the issuance of this Report, SGI release the name, address and customer number of the third party to the Applicant.

Dated at Regina, in the Province of Saskatchewan, this 9<sup>th</sup> day of June, 2026.

Grace Hession David  
Saskatchewan Information and Privacy Commissioner