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The CIPM certification exam covers a range of privacy management topics, including privacy program governance, privacy

operations management, privacy risk management, and privacy program assessment. CIPM exam is designed to ensure that candidates have a thorough understanding of privacy laws, regulations, and best practices, as well as the ability to apply that knowledge to real-world privacy challenges. CIPM Exam is also designed to test candidates' ability to manage privacy teams, communicate effectively with stakeholders, and ensure compliance with privacy policies and procedures.

IAPP Certified Information Privacy Manager (CIPM) Sample Questions (Q272-Q277):

NEW QUESTION # 272

SCENARIO

Please use the following to answer the next QUESTION:

Edufox has hosted an annual convention of users of its famous e-learning software platform, and over time, it has become a grand event. It fills one of the large downtown conference hotels and overflows into the others, with several thousand attendees enjoying three days of presentations, panel discussions and networking. The convention is the centerpiece of the company's product rollout schedule and a great training opportunity for current users. The sales force also encourages prospective clients to attend to get a better sense of the ways in which the system can be customized to meet diverse needs and understand that when they buy into this system, they are joining a community that feels like family.

This year's conference is only three weeks away, and you have just heard news of a new initiative supporting it: a smartphone app for attendees. The app will support late registration, highlight the featured presentations and provide a mobile version of the conference program. It also links to a restaurant reservation system with the best cuisine in the areas featured. "It's going to be great," the developer, Deidre Hoffman, tells you, "if, that is, we actually get it working!" She laughs nervously but explains that because of the tight time frame she'd been given to build the app, she outsourced the job to a local firm. "It's just three young people," she says, "but they do great work." She describes some of the other apps they have built. When asked how they were selected for this job, Deidre shrugs. "They do good work, so I chose them." Deidre is a terrific employee with a strong track record. That's why she's been charged to deliver this rushed project. You're sure she has the best interests of the company at heart, and you don't doubt that she's under pressure to meet a deadline that cannot be pushed back. However, you have concerns about the app's handling of personal data and its security safeguards. Over lunch in the break room, you start to talk to her about it, but she quickly tries to reassure you, "I'm sure with your help we can fix any security issues if we have to, but I doubt there'll be any. These people build apps for a living, and they know what they're doing. You worry too much, but that's why you're so good at your job!" What safeguard can most efficiently ensure that privacy protection is a dimension of relationships with vendors?

- A. Do business only with vendors who are members of privacy trade associations.
- **B. Include appropriate language about privacy protection in vendor contracts.**
- C. Require that a person trained in privacy protection be part of all vendor selection teams.
- D. Perform a privacy audit on any vendor under consideration.

Answer: B

Explanation:

This answer is the best way to ensure that privacy protection is a dimension of relationships with vendors, as it can establish clear and binding terms and conditions for both parties regarding their roles and responsibilities for data processing activities. Including appropriate language about privacy protection in vendor contracts can help to define the scope, purpose, duration and type of data processing, as well as the rights and obligations of both parties. The contracts can also specify the technical and organizational measures that the vendor must implement to protect the data from unauthorized or unlawful access, use, disclosure, alteration or destruction, and to notify the organization of any security incidents or breaches. The contracts can also allow the organization to monitor, audit or inspect the vendor's performance and compliance with the contract terms and applicable laws and regulations. Reference: IAPP CIPM Study Guide, page 82; ISO/IEC 27002:2013, section 15.1.2

NEW QUESTION # 273

All of the following should be mandatory in the contract for the outsourced vendor EXCEPT?

- **A. Cyber insurance.**
- B. Information security controls.
- C. Liability for data breach.
- D. Generation of reports and metrics.

Answer: A

Explanation:

Step-by-Step Comprehensive Detailed Explanation with All Information Privacy Manager CIPM Study Guide References When

creating contracts for outsourced vendors, it is critical to include clauses that protect the organization's interests, especially regarding privacy and data security. Let's analyze each option:

A). Generation of reports and metrics:

Reports and metrics help monitor compliance and performance of the vendor. They are vital for ensuring the vendor meets agreed-upon privacy standards and obligations.

B). Information security controls:

Specific security controls are essential to mitigate risks associated with data breaches or unauthorized access to personal data. These should be explicitly included to protect sensitive information.

C). Liability for data breach:

This clause ensures the vendor is accountable for any harm caused by a data breach under their control. It is critical to hold vendors liable to safeguard the organization.

D). Cyber insurance:

While important for managing overall risk, cyber insurance is typically a broader organizational risk management tool and not a mandatory element of every vendor contract. Including such a requirement may not be applicable or enforceable universally.

CIPM Study Guide References:

* Privacy Program Operational Life Cycle - "Maintain" phase discusses vendor management and contractual requirements.

* Key contractual elements in vendor agreements highlight essential components such as liability, security controls, and reporting.

* Risk management frameworks address the use of cyber insurance as an organizational strategy rather than a specific contractual mandate.

NEW QUESTION # 274

Which statement is FALSE regarding the use of technical security controls?

- A. Most privacy legislation lists the types of technical security controls that must be implemented.
- B. A person with security knowledge should be involved with the deployment of technical security controls.
- C. Technical security controls deployed for one jurisdiction often satisfy another jurisdiction.
- D. Technical security controls are part of a data governance strategy.

Answer: A

Explanation:

The statement that is false regarding the use of technical security controls is that most privacy legislation lists the types of technical security controls that must be implemented. Technical security controls are the hardware and software components that protect a system against cyberattacks, such as encryption, firewalls, antivirus software, and access control mechanisms¹ However, most privacy legislation does not prescribe specific types of technical security controls that must be implemented by organizations. Instead, they usually require organizations to implement reasonable or appropriate technical security measures to protect personal data from unauthorized or unlawful access, use, disclosure, alteration, or destruction²³ The exact level and type of technical security controls may depend on various factors, such as the nature and sensitivity of the data, the risks and threats involved, the state of the art technology available, and the cost and feasibility of implementation⁴ Therefore, organizations have some flexibility and discretion in choosing the most suitable technical security controls for their data processing activities. References: 1: Technical Controls - Cybersecurity Resilience - Resilient Energy Platform; 2: [General Data Protection Regulation (GDPR) - Official Legal Text], Article 32; 3: [Privacy Act 1988], Schedule 1 - Australian Privacy Principles (APPs), APP 11; 4: Technical Security Controls: Encryption, Firewalls & More

NEW QUESTION # 275

SCENARIO

Please use the following to answer the next QUESTION:

Martin Briseno is the director of human resources at the Canyon City location of the U.S. hotel chain Pacific Suites. In 1998, Briseno decided to change the hotel's on-the-job mentoring model to a standardized training program for employees who were progressing from line positions into supervisory positions. He developed a curriculum comprising a series of lessons, scenarios, and assessments, which was delivered in-person to small groups. Interest in the training increased, leading Briseno to work with corporate HR specialists and software engineers to offer the program in an online format. The online program saved the cost of a trainer and allowed participants to work through the material at their own pace.

Upon hearing about the success of Briseno's program, Pacific Suites corporate Vice President Maryanne Silva-Hayes expanded the training and offered it company-wide. Employees who completed the program received certification as a Pacific Suites Hospitality Supervisor. By 2001, the program had grown to provide industry-wide training. Personnel at hotels across the country could sign up and pay to take the course online.

As the program became increasingly profitable, Pacific Suites developed an offshoot business, Pacific Hospitality Training (PHT).

The sole focus of PHT was developing and marketing a variety of online courses and course progressions providing a number of professional certifications in the hospitality industry.

By setting up a user account with PHT, course participants could access an information library, sign up for courses, and take end-of-course certification tests. When a user opened a new account, all information was saved by default, including the user's name, date of birth, contact information, credit card information, employer, and job title. The registration page offered an opt-out choice that users could click to not have their credit card numbers saved. Once a user name and password were established, users could return to check their course status, review and reprint their certifications, and sign up and pay for new courses. Between 2002 and 2008, PHT issued more than 700,000 professional certifications.

PHT's profits declined in 2009 and 2010, the victim of industry downsizing and increased competition from e-learning providers. By 2011, Pacific Suites was out of the online certification business and PHT was dissolved. The training program's systems and records remained in Pacific Suites' digital archives, unaccessed and unused. Briseno and Silva-Hayes moved on to work for other companies, and there was no plan for handling the archived data after the program ended. After PHT was dissolved, Pacific Suites executives turned their attention to crucial day-to-day operations. They planned to deal with the PHT materials once resources allowed.

In 2012, the Pacific Suites computer network was hacked. Malware installed on the online reservation system exposed the credit card information of hundreds of hotel guests. While targeting the financial data on the reservation site, hackers also discovered the archived training course data and registration accounts of Pacific Hospitality Training's customers. The result of the hack was the exfiltration of the credit card numbers of recent hotel guests and the exfiltration of the PHT database with all its contents.

A Pacific Suites systems analyst discovered the information security breach in a routine scan of activity reports. Pacific Suites quickly notified credit card companies and recent hotel guests of the breach, attempting to prevent serious harm. Technical security engineers faced a challenge in dealing with the PHT data.

PHT course administrators and the IT engineers did not have a system for tracking, cataloging, and storing information. Pacific Suites has procedures in place for data access and storage, but those procedures were not implemented when PHT was formed. When the PHT database was acquired by Pacific Suites, it had no owner or oversight. By the time technical security engineers determined what private information was compromised, at least 8,000 credit card holders were potential victims of fraudulent activity.

In the Information Technology engineers had originally set the default for customer credit card information to "Do Not Save," this action would have been in line with what concept?

- A. Use limitation
- B. Reactive risk management
- C. Harm minimization
- **D. Privacy by Design**

Answer: D

NEW QUESTION # 276

An organization can use Privacy-Enhancing Technologies (PETs) to?

- A. Produce data for the privacy professional to interpret.
- **B. Strengthen existing privacy controls.**
- C. Replace current technical controls.
- D. Ensure compliance with local privacy regulations.

Answer: B

Explanation:

Comprehensive and Detailed Explanation:

Privacy-Enhancing Technologies (PETs) are used to strengthen existing privacy controls by improving data security, minimizing data exposure, and reducing compliance risks.

* Option A (Replace current controls) is incorrect because PETs work alongside existing security measures rather than replacing them.

* Option C (Ensure compliance) is incorrect because PETs help with compliance but do not guarantee it.

* Option D (Produce data for interpretation) misrepresents PETs, as their primary function is protecting data rather than generating insights.

Common PETs include encryption, differential privacy, anonymization, and secure multi-party computation.

Reference: CIPM Official Textbook, Module: Privacy Technology and Security Controls - Section on Implementing Privacy-Enhancing Technologies (PETs).

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