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The CIPM exam covers a wide range of privacy management topics, including creating a privacy program, managing privacy risks, implementing privacy policies, and ensuring compliance with global privacy laws and regulations. CIPM exam is designed to test the candidate's knowledge of privacy laws and regulations, as well as their ability to apply this knowledge to real-world scenarios. The CIPM exam is a rigorous and comprehensive test that requires candidates to have a thorough understanding of privacy management principles and practices.

The CIPM Certification is highly valued by employers and clients alike, as it demonstrates a commitment to professionalism, ethics, and best practices in privacy management. Certified Information Privacy Manager (CIPM) certification is not only beneficial for advancing your career and increasing your earning potential but also enhances the reputation of the organization you work for.

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To prepare for the CIPM Certification Exam, candidates can take advantage of a range of resources offered by the IAPP, including

training courses, study materials, and practice exams. By investing time and effort into preparing for the exam, professionals can achieve a certification that will enhance their career prospects and help them to become leaders in the field of privacy management.

IAPP Certified Information Privacy Manager (CIPM) Sample Questions (Q198-Q203):

NEW QUESTION # 198

What is the function of the privacy operational life cycle?

- A. It allows the organization to respond to ever-changing privacy demands
- **B. It establishes initial plans for privacy protection and implementation**
- C. It ensures that outdated privacy policies are retired on a set schedule
- D. It allows privacy policies to mature to a fixed form

Answer: B

NEW QUESTION # 199

SCENARIO

Please use the following to answer the next QUESTION:

Natalia, CFO of the Nationwide Grill restaurant chain, had never seen her fellow executives so anxious. Last week, a data processing firm used by the company reported that its system may have been hacked, and customer data such as names, addresses, and birthdays may have been compromised. Although the attempt was proven unsuccessful, the scare has prompted several Nationwide Grill executives to Question the company's privacy program at today's meeting.

Alice, a vice president, said that the incident could have opened the door to lawsuits, potentially damaging Nationwide Grill's market position. The Chief Information Officer (CIO), Brendan, tried to assure her that even if there had been an actual breach, the chances of a successful suit against the company were slim. But Alice remained unconvinced.

Spencer - a former CEO and currently a senior advisor - said that he had always warned against the use of contractors for data processing. At the very least, he argued, they should be held contractually liable for telling customers about any security incidents. In his view, Nationwide Grill should not be forced to soil the company name for a problem it did not cause.

One of the business development (BD) executives, Haley, then spoke, imploring everyone to see reason. "Breaches can happen, despite organizations' best efforts," she remarked. "Reasonable preparedness is key." She reminded everyone of the incident seven years ago when the large grocery chain Tinkerton's had its financial information compromised after a large order of Nationwide Grill frozen dinners. As a long-time BD executive with a solid understanding of Tinkerton's's corporate culture, built up through many years of cultivating relationships, Haley was able to successfully manage the company's incident response.

Spencer replied that acting with reason means allowing security to be handled by the security functions within the company - not BD staff. In a similar way, he said, Human Resources (HR) needs to do a better job training employees to prevent incidents. He pointed out that Nationwide Grill employees are overwhelmed with posters, emails, and memos from both HR and the ethics department related to the company's privacy program. Both the volume and the duplication of information means that it is often ignored altogether.

Spencer said, "The company needs to dedicate itself to its privacy program and set regular in-person trainings for all staff once a month." Alice responded that the suggestion, while well-meaning, is not practical. With many locations, local HR departments need to have flexibility with their training schedules. Silently, Natalia agreed.

How could the objection to Spencer's training suggestion be addressed?

- A. By introducing a system of periodic refresher trainings.
- B. By customizing training based on length of employee tenure.
- **C. By offering alternative delivery methods for trainings.**
- D. By requiring training only on an as-needed basis.

Answer: C

Explanation:

This answer is the best way to address the objection to Spencer's training suggestion, as it can provide flexibility and convenience for employees who work in different locations or have different schedules. Alternative delivery methods for trainings can include online courses, webinars, podcasts, videos or self-paced modules that can be accessed anytime and anywhere by employees. Alternative delivery methods can also reduce the cost and time required for in-person trainings, while still ensuring that employees receive consistent and relevant information on the company's privacy program. Reference: IAPP CIPM Study Guide, page 90; ISO/IEC 27002:2013, section 7.2.2

NEW QUESTION # 200

SCENARIO

Please use the following to answer the next QUESTION:

As the Director of data protection for Consolidated Records Corporation, you are justifiably pleased with your accomplishments so far. Your hiring was precipitated by warnings from regulatory agencies following a series of relatively minor data breaches that could easily have been worse. However, you have not had a reportable incident for the three years that you have been with the company. In fact, you consider your program a model that others in the data storage industry may note in their own program development. You started the program at Consolidated from a jumbled mix of policies and procedures and worked toward coherence across departments and throughout operations. You were aided along the way by the program's sponsor, the vice president of operations, as well as by a Privacy Team that started from a clear understanding of the need for change.

Initially, your work was greeted with little confidence or enthusiasm by the company's "old guard" among both the executive team and frontline personnel working with data and interfacing with clients. Through the use of metrics that showed the costs not only of the breaches that had occurred, but also projections of the costs that easily could occur given the current state of operations, you soon had the leaders and key decision-makers largely on your side. Many of the other employees were more resistant, but face-to-face meetings with each department and the development of a baseline privacy training program achieved sufficient "buy-in" to begin putting the proper procedures into place.

Now, privacy protection is an accepted component of all current operations involving personal or protected data and must be part of the end product of any process of technological development. While your approach is not systematic, it is fairly effective.

You are left contemplating:

What must be done to maintain the program and develop it beyond just a data breach prevention program?

How can you build on your success?

What are the next action steps?

Which of the following would be most effectively used as a guide to a systems approach to implementing data protection?

- A. International Organization for Standardization 27000 Series.
- B. Data Lifecycle Management Standards.
- C. United Nations Privacy Agency Standards.
- D. International Organization for Standardization 9000 Series.

Answer: A

NEW QUESTION # 201

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!" You want to point out that normal protocols have NOT been followed in this matter. Which process in particular has been neglected?

- A. Vendor due diligence vetting.
- B. Data mapping.
- C. Privacy breach prevention.
- D. Forensic inquiry.

Answer: A

Explanation:

This answer is the best way to point out that normal protocols have not been followed in this matter, as it shows that the vendor selection process was not conducted properly and that the vendor's privacy and security practices were not assessed or verified before engaging them for the app development project. Vendor due diligence vetting is a process that involves evaluating and comparing potential vendors based on their qualifications, capabilities, reputation, experience, performance and compliance with the organization's standards and expectations, as well as the applicable laws and regulations. Vendor due diligence vetting can help to ensure that the vendor can deliver the project on time, on budget and on quality, as well as protect the personal data that they process on behalf of the organization. Vendor due diligence vetting can also help to identify and mitigate any risks or issues that may arise from the vendor relationship, such as data breaches, legal actions, fines, sanctions or investigations. References: IAPP CIPM Study Guide, page 821; ISO/IEC 27002:2013, section 15.1.1

NEW QUESTION # 202

SCENARIO

Please use the following to answer the next QUESTION:

John is the new privacy officer at the prestigious international law firm - A&M LLP. A&M LLP is very proud of its reputation in the practice areas of Trusts & Estates and Merger & Acquisition in both U.S. and Europe.

During lunch with a colleague from the Information Technology department, John heard that the Head of IT, Derrick, is about to outsource the firm's email continuity service to their existing email security vendor - MessageSafe. Being successful as an email hygiene vendor, MessageSafe is expanding its business by leasing cloud infrastructure from Cloud Inc. to host email continuity service for A&M LLP.

John is very concerned about this initiative. He recalled that MessageSafe was in the news six months ago due to a security breach. Immediately, John did a quick research of MessageSafe's previous breach and learned that the breach was caused by an unintentional mistake by an IT administrator. He scheduled a meeting with Derrick to address his concerns.

At the meeting, Derrick emphasized that email is the primary method for the firm's lawyers to communicate with clients, thus it is critical to have the email continuity service to avoid any possible email downtime.

Derrick has been using the anti-spam service provided by MessageSafe for five years and is very happy with the quality of service provided by MessageSafe. In addition to the significant discount offered by MessageSafe, Derrick emphasized that he can also speed up the onboarding process since the firm already has a service contract in place with MessageSafe. The existing on-premises email continuity solution is about to reach its end of life very soon and he doesn't have the time or resource to look for another solution.

Furthermore, the off-premises email continuity service will only be turned on when the email service at A&M LLP's primary and secondary data centers are both down, and the email messages stored at MessageSafe site for continuity service will be automatically deleted after 30 days.

Which of the following is the most effective control to enforce MessageSafe's implementation of appropriate technical countermeasures to protect the personal data received from A&M LLP?

- A. MessageSafe must apply appropriate security controls on the cloud infrastructure.
- B. MessageSafe must flow-down its data protection contract terms with A&M LLP to Cloud Inc.
- C. MessageSafe must apply due diligence before trusting Cloud Inc. with the personal data received from A&M LLP.
- D. MessageSafe must notify A&M LLP of a data breach.

Answer: A

Explanation:

The most effective control to enforce MessageSafe's implementation of appropriate technical countermeasures to protect the personal data received from A&M LLP is to require MessageSafe to apply appropriate security controls on the cloud infrastructure. This control ensures that MessageSafe takes responsibility for securing the personal data that it processes on behalf of A&M LLP on the cloud platform provided by Cloud Inc. According to the GDPR, data processors must implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of processing personal data¹ These measures may include encryption, pseudonymisation, access control, backup and recovery, logging and monitoring, vulnerability management, incident response, etc² Furthermore, data processors must ensure that any sub-processors they engage to process personal data on behalf of the data controller also comply with the same obligations³ Therefore, MessageSafe must ensure that Cloud Inc. provides adequate security guarantees for the cloud infrastructure and services that it uses to host the email continuity service for A&M LLP. MessageSafe must also monitor and audit the security performance of Cloud Inc. and report any issues or breaches to A&M LLP. References: 1: Article 32 GDPR | General Data Protection Regulation (GDPR); 2: Guidelines 4/2019 on Article 25 Data Protection by Design and by Default | European Data Protection Board; 3: Article 28 GDPR | General Data Protection Regulation (GDPR)

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