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## CIPM FINAL EXAM QUESTIONS AND ANSWERS 2023-2025

Proactive privacy management is accomplished through three tasks - 1) Define your organization's privacy vision and privacy mission statements 2) Develop privacy strategy 3) Structure your privacy team

This is needed to structure responsibilities with business goals - Strategic Management

Identifies alignment to organizational vision and defines the privacy leaders for an organization, along with the resources necessary to execute the vision. - Strategic Management model

Member of the privacy team who may be responsible for privacy program framework development, management and reporting within an organization - Privacy professional

Strategic management of privacy starts by - creating or updating the company's vision and mission statement based on privacy best practice

Privacy best practices - 1) Develop vision and mission statement objectives 2) define privacy program scope 3) identify legal and regulatory compliance challenges 4) identify organization personal information legal requirements

This key factor that lays the groundwork for the rest of the privacy program elements and is typically comprised of a short sentence or two that describe the purpose and ideas in less than 30 seconds. - Vision or mission statement

This explains what you do as an organization, not who you are; what the organization stands for and why what you do an organization to protect personal information is done - Mission Statement

What are the steps in the five step metric cycle - Identify, Define, Select, Collect, Analyze

The first step in the selecting the correct metrics starts by what? - Identifying the intended metric audience

The primary audience for metrics may include - Legal and privacy officers, senior leadership; CIO, CSO, PM, Information Systems Owner (ISO), Information Security Officer (ISO), Others considered users and managers

The secondary audience includes those who may not have privacy as a primary task include - CFO, Training organizations, HR, IG, HIPPA security officials

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## IAPP Certified Information Privacy Manager (CIPM) Sample Questions

## (Q220-Q225):

### NEW QUESTION # 220

When supporting the business and data privacy program expanding into a new jurisdiction, it is important to do all of the following EXCEPT?

- A. Perform an assessment of the laws applicable in that new jurisdiction.
- B. Consider culture and whether the privacy framework will need to account for changes in culture.
- C. Appoint a new Privacy Officer (PO) for that jurisdiction.
- D. Identify the stakeholders.

**Answer: C**

Explanation:

When expanding into a new jurisdiction, it is not necessary to appoint a new Privacy Officer (PO) for that jurisdiction, unless the local law requires it. The other options are important steps to ensure compliance with the new jurisdiction's privacy laws and regulations, as well as to align the privacy program with the business objectives and culture of the new market. Reference: CIPM Body of Knowledge, Domain I: Privacy Program Governance, Task 1: Establish the privacy program vision and strategy.

### NEW QUESTION # 221

#### 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?

What analytic can be used to track the financial viability of the program as it develops?

- A. Return on investment
- B. Cost basis
- C. Breach impact modeling
- D. Gap analysis

**Answer: A**

### NEW QUESTION # 222

A minimum requirement for carrying out a Data Protection Impact Assessment (DPIA) would include?

- A. Monitoring of a publicly accessible area on a large scale.
- B. Processing on a large scale of special categories of data.
- C. Assessment of security measures.
- D. Assessment of the necessity and proportionality.

**Answer: B**

Explanation:

Processing on a large scale of special categories of data is a minimum requirement for carrying out a Data Protection Impact Assessment (DPIA) under the General Data Protection Regulation (GDPR). A DPIA is a type of Privacy Impact Assessment (PIA) that is specifically required by the GDPR when a processing activity is likely to result in a high risk to the rights and freedoms of natural persons. According to Article 35(3)(b) of the GDPR, a DPIA is mandatory when the processing involves a large scale of special categories of data or personal data relating to criminal convictions and offences. Special categories of data are personal data that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data, sex life or sexual orientation. These types of data are considered more sensitive and require more protection, as they may pose higher risks of discrimination, identity theft, fraud, or other harms to the data subjects.

Reference:

CIPM Body of Knowledge (2021), Domain IV: Privacy Program Operational Life Cycle, Section C: Monitoring and Managing Program Performance Subsection 1: Privacy Impact Assessments CIPM Study Guide (2021), Chapter 9: Monitoring and Managing Program Performance Section 9.1: Privacy Impact Assessments CIPM Textbook (2019), Chapter 9: Monitoring and Managing Program Performance Section 9.1: Privacy Impact Assessments CIPM Practice Exam (2021), Question 147 GDPR Article 35(3) (b) and Article 9

### NEW QUESTION # 223

Which of the following is NOT a main technical data control area?

- A. Obfuscation.
- B. Data minimization.
- C. Tokenization.
- D. Access controls.

**Answer: A**

Explanation:

Obfuscation is not a main technical data control area

a. Obfuscation means hiding or disguising data or information to make it less intelligible or accessible. Obfuscation can be used as a security measure or a privacy-enhancing technique, but it is not a specific type of data control. The main technical data control areas are tokenization, encryption, access controls, and data minimization. Tokenization means replacing sensitive data with non-sensitive substitutes called tokens that have no intrinsic value. Encryption means transforming data into an unreadable format that can only be decrypted with a key. Access controls mean restricting who can access or modify data based on their roles, permissions, or authentication methods. Data minimization means collecting, storing, and processing only the minimum amount of data necessary for a specific purpose<sup>1, 2</sup>. Reference: CIPM - International Association of Privacy Professionals, Free CIPM Study Guide - International Association of Privacy Professionals

### NEW QUESTION # 224

SCENARIO

Please use the following to answer the next QUESTION:

For 15 years, Albert has worked at Treasure Box - a mail order company in the United States (U.S.) that used to sell decorative candles around the world, but has recently decided to limit its shipments to customers in the 48 contiguous states. Despite his years of experience, Albert is often overlooked for managerial positions. His frustration about not being promoted, coupled with his recent interest in issues of privacy protection, have motivated Albert to be an agent of positive change.

He will soon interview for a newly advertised position, and during the interview, Albert plans on making executives aware of lapses in the company's privacy program. He feels certain he will be rewarded with a promotion for preventing negative consequences resulting from the company's outdated policies and procedures.

For example, Albert has learned about the AICPA (American Institute of Certified Public Accountants)/CICA (Canadian Institute of Chartered Accountants) Privacy Maturity Model (PMM). Albert thinks the model is a useful way to measure Treasure Box's ability to protect personal data. Albert has noticed that Treasure Box fails to meet the requirements of the highest level of maturity of this model; at his interview, Albert will pledge to assist the company with meeting this level in order to provide customers with the most rigorous security available.

Albert does want to show a positive outlook during his interview. He intends to praise the company's commitment to the security of customer and employee personal data against external threats. However, Albert worries about the high turnover rate within the company, particularly in the area of direct phone marketing.

He sees many unfamiliar faces every day who are hired to do the marketing, and he often hears complaints in the lunch room regarding long hours and low pay, as well as what seems to be flagrant disregard for company procedures.

In addition, Treasure Box has had two recent security incidents. The company has responded to the incidents with internal audits and

updates to security safeguards. However, profits still seem to be affected and anecdotal evidence indicates that many people still harbor mistrust. Albert wants to help the company recover.

He knows there is at least one incident the public is unaware of, although Albert does not know the details.

He believes the company's insistence on keeping the incident a secret could be a further detriment to its reputation. One further way that Albert wants to help Treasure Box regain its stature is by creating a toll-free number for customers, as well as a more efficient procedure for responding to customer concerns by postal mail.

In addition to his suggestions for improvement, Albert believes that his knowledge of the company's recent business maneuvers will also impress the interviewers. For example, Albert is aware of the company's intention to acquire a medical supply company in the coming weeks.

With his forward thinking, Albert hopes to convince the managers who will be interviewing him that he is right for the job.

On which of the following topics does Albert most likely need additional knowledge?

- A. The necessary maturity level of privacy programs
- B. The possibility of delegating responsibilities related to privacy
- C. The requirements for a managerial position with privacy protection duties
- D. The role of privacy in retail companies

**Answer: A**

Explanation:

The topic that Albert most likely needs additional knowledge on is the necessary maturity level of privacy programs. Albert thinks that the AICPA/CICA Privacy Maturity Model (PMM) is a useful way to measure Treasure Box's ability to protect personal data, and that the company should aim to meet the highest level of maturity of this model. However, Albert may not realize that the PMM is not a prescriptive or definitive standard for privacy programs, but rather a descriptive and flexible tool for self-assessment and improvement.

The PMM does not require or expect organizations to achieve the highest level of maturity for all privacy practices, as this may not be feasible, realistic, or appropriate for their specific context, objectives, and risks.

The PMM recognizes that different levels of maturity may be suitable for different organizations or different aspects of their privacy programs, depending on their needs and circumstances. Therefore, Albert should not assume that the highest level of maturity is always the best or the most rigorous option for privacy protection.

Albert should learn more about how to use the PMM effectively and appropriately, and how to determine the optimal level of maturity for Treasure Box's privacy program.

The other options are not topics that Albert most likely needs additional knowledge on. Albert seems to have a good understanding of the role of privacy in retail companies, as he is aware of the importance of protecting customer and employee personal data, as well as complying with relevant laws and regulations. Albert also seems to have a good understanding of the possibility of delegating responsibilities related to privacy, as he plans to assist the company with meeting its privacy obligations and goals. Albert also seems to have a good understanding of the requirements for a managerial position with privacy protection duties, as he intends to demonstrate his knowledge, skills, and experience in this area during his interview. References: [AICPA /CICA Privacy Maturity Model]; [Privacy Maturity Model: How Mature Is Your Privacy Program?]

## NEW QUESTION # 225

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