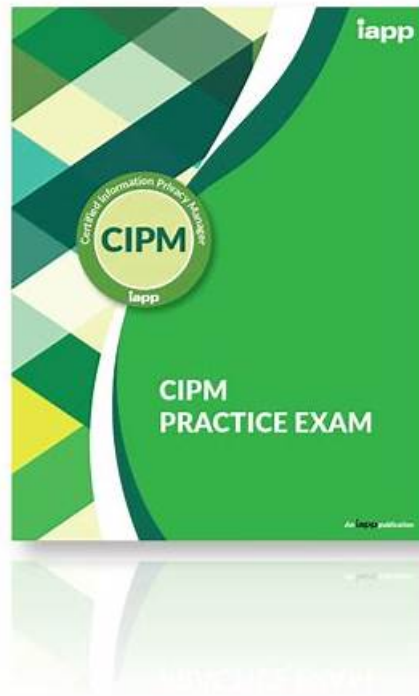# IAPP CIPM Dumps [2026] - To Acquire Very Best Final Results

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IAPP Certified Information Privacy Manager (CIPM) Sample Questions (Q69-Q74):

NEW QUESTION # 69
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, un-accessed 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, cataloguing, 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.

What key mistake set the company up to be vulnerable to a security breach?

- A. Overlooking the need to organize and categorize data
- B. Neglecting to make a backup copy of archived electronic files
- C. Collecting too much information and keeping it for too long
- D. Failing to outsource training and data management to professionals

Answer: A

NEW QUESTION # 70
Your marketing team wants to know why they need a check box for their SMS opt-in. You explain it is part of the consumer's right to?

- A. Raise complaints.
- B. Be informed.
- C. Request correction.
- D. Have access.

Answer: B

Explanation:
Explanation
The marketing team needs a check box for their SMS opt-in because it is part of the consumer's right to be informed. This right means that consumers have the right to know how their personal data is collected, used, shared, and protected by the organization.

The check box allows consumers to give their consent and opt-in to receive SMS messages from the organization, and also informs them of the purpose and scope of such messages. The other rights are not relevant in this case, as they are related to other aspects of data processing, such as correction, complaints, and access. References: CIPM Body of Knowledge, Domain IV: Privacy Program Communication, Section A: Communicating to Stakeholders, Subsection 1: Consumer Rights.

NEW QUESTION # 71

You would like your organization to be independently audited to demonstrate compliance with international privacy standards and to identify gaps for remediation.
Which type of audit would help you achieve this objective?

- A. Third-party audit.
- B. Fourth-party audit.
- C. Second-party audit.
- D. First-party audit.

Answer: A

Explanation:
A third-party audit would help an organization achieve the objective of demonstrating compliance with international privacy standards and identifying gaps for remediation. A third-party audit is an audit conducted by an independent and external auditor who is not affiliated with either the audited organization or its customers. A third-party audit can provide an objective and impartial assessment of the organization's privacy practices and policies, as well as verify its compliance with relevant standards and regulations. A third-party audit can also help the organization identify areas for improvement and recommend corrective actions. A third-party audit can enhance the organization's reputation, trustworthiness, and credibility among its stakeholders and customers.
A first-party audit is an audit conducted by the organization itself or by someone within the organization who has been designated as an auditor. A first-party audit is also known as an internal audit. A first-party audit can help the organization monitor its own performance, evaluate its compliance with internal policies and procedures, and identify potential risks and opportunities for improvement. However, a first-party audit may not be sufficient to demonstrate compliance with external standards and regulations, as it may lack independence and objectivity.
A second-party audit is an audit conducted by a party that has an interest in or a relationship with the audited organization, such as a customer, a supplier, or a partner. A second-party audit is also known as an external audit. A second-party audit can help the party verify that the audited organization meets its contractual obligations, expectations, and requirements. A second-party audit can also help the party evaluate the quality and reliability of the audited organization's products or services. However, a second-party audit may not be able to provide a comprehensive and unbiased assessment of the audited organization's privacy practices and policies, as it may be influenced by the party's own interests and objectives. Reference: Types of Audits: 14 Types of Audits and Level of Assurance (2022)

NEW QUESTION # 72

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!" Since it

is too late to restructure the contract with the vendor or prevent the app from being deployed, what is the best step for you to take next?

- A. Develop security protocols for the vendor and mandate that they be deployed.
- B. Implement a more comprehensive suite of information security controls than the one used by the vendor.
- C. Ask the vendor for verifiable information about their privacy protections so weaknesses can be identified.
- D. Insist on an audit of the vendor's privacy procedures and safeguards.

Answer: C

Explanation:
This answer is the best step to take next, as it can help you to assess the current state of the vendor's privacy practices and determine if they meet the organization's standards and expectations, as well as the applicable laws and regulations. Asking the vendor for verifiable information about their privacy protections can include requesting documentation, evidence or demonstration of how they collect, use, store, protect, share and dispose of personal data, what policies and procedures they have in place, what technical and organizational measures they implement, what certifications or audits they have obtained or undergone, and how they handle any privacy incidents or breaches. Based on this information, you can identify any weaknesses or gaps in the vendor's privacy protections and recommend or require any improvements or corrections before the app is deployed. References: IAPP CIPM Study Guide, page 82; ISO/IEC 27002:2013, section 15.1.2

NEW QUESTION # 73
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 in 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.
What is one important factor that Albert fails to consider regarding Treasure Box's response to their recent security incident?

- A. How long data at the company is kept
- B. What the nature of the data is
- C. How data at the company is collected
- D. Who has access to the data

Answer: B

Explanation:
This answer is an important factor that Albert fails to consider, as it can affect the legal and ethical obligations and implications of the company's response to the security incident, as well as the potential impact and harm to the individuals whose data is involved. The nature of the data refers to the type, category, sensitivity and value of the data that is collected, processed and stored by the company, such as personal, financial, health, biometric or behavioral data. Depending on the nature of the data, the company may have different requirements or restrictions for notifying, reporting or disclosing the security incident to the relevant authorities, customers, partners or stakeholders, as well as for mitigating or compensating the effects of the incident. For example, if the data is considered sensitive or confidential, such as health or medical information, the company may have a higher duty of care and a stricter obligation to protect and secure the data, as well as to inform and assist the individuals whose data is compromised.

NEW QUESTION # 74
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