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### IAPP Certified Information Privacy Manager (CIPM) Sample Questions (Q181-Q186):

#### NEW QUESTION # 181

When devising effective employee policies to address a particular issue, which of the following should be included in the first draft?

- A. Points of contact for the employee.
- B. Explanation of how the policy is applied within the organization.
- C. Roles and responsibilities of the different groups of individuals.
- D. Rationale for the policy.

**Answer: D**

Explanation:

Explanation

When devising effective employee policies to address a particular issue, it is important to include the rationale for the policy in the first draft, as it explains why the policy is needed and what benefits it brings to the organization and its employees. The rationale can also help to gain support and buy-in from the management and staff, as well as to align the policy with the organizational values and goals. The other options are also important elements of an employee policy, but they can be added or refined in later drafts.

References: CIPM Body of Knowledge, Domain IV: Privacy Program Communication Activities, Task 2: Develop internal communication plans.

#### NEW QUESTION # 182

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

**Answer: D**

#### NEW QUESTION # 183

"Collection," "access" and "destruction" are aspects of what privacy management process?

- A. The breach response plan
- **B. The data governance strategy**
- C. The business case
- D. The metric life cycle

**Answer: B**

#### NEW QUESTION # 184

For an organization that has just experienced a data breach, what might be the least relevant metric for a company's privacy and governance team?

- A. The number of Privacy Impact Assessments that have been completed.
- B. The number of employees who have completed data awareness training.
- C. The number of privacy rights requests that have been exercised.
- **D. The number of security patches applied to company devices.**

**Answer: D**

Explanation:

The number of security patches applied to company devices might be the least relevant metric for a company's privacy and governance team after a data breach. While security patches are important for preventing future breaches, they do not directly measure the impact or response of the current breach. The other metrics are more relevant for assessing how the company handled the breach, such as how it complied with the privacy rights of affected individuals, how it evaluated the privacy risks of its systems, and how it trained its employees on data awareness. References: CIPM Study Guide, page 28.

#### NEW QUESTION # 185

What is the main purpose in notifying data subjects of a data breach?

- A. To ensure organizations have accountability for the sufficiency of their security measures.
- **B. To allow individuals to take any actions required to protect themselves from possible consequences.**

- C. To enable regulators to understand trends and developments that may shape the law.
- D. To avoid financial penalties and legal liability.

**Answer: B**

Explanation:

Step-by-Step Comprehensive Detailed Explanation with All Information Privacy Manager CIPM Study Guide References Data breach notifications are intended to protect individuals and allow them to take action. Let's analyze the options:

A . To avoid financial penalties and legal liability:

While compliance with breach notification laws can reduce liability, this is not the primary purpose of notifying data subjects.

B . To enable regulators to understand trends and developments that may shape the law:

This describes the purpose of breach reporting to regulators, not notifying data subjects.

C . To ensure organizations have accountability for the sufficiency of their security measures:

This relates to internal accountability and compliance but is not the main reason for notifying data subjects.

D . To allow individuals to take any actions required to protect themselves from possible consequences:

This is the primary purpose of data breach notifications, empowering individuals to mitigate risks like identity theft or financial fraud.

CIPM Study Guide References:

Privacy Program Operational Life Cycle - "Respond" phase includes breach notification as a requirement under various laws (e.g., GDPR, CCPA).

GDPR Article 34 specifies that breach notifications to individuals aim to enable protective actions.

## NEW QUESTION # 186

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