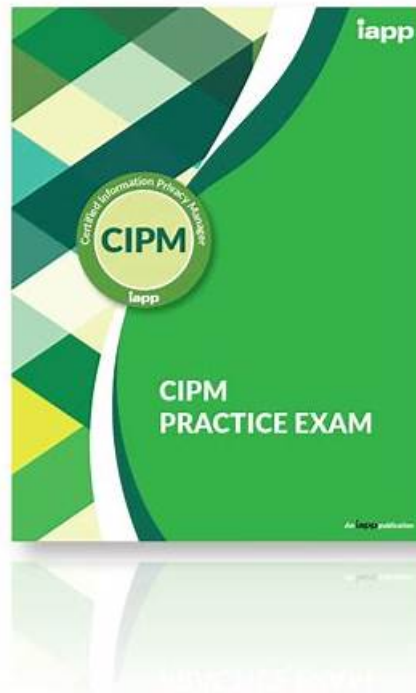


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## IAPP Certified Information Privacy Manager (CIPM) Sample Questions (Q54-Q59):

### NEW QUESTION # 54

#### SCENARIO

Please use the following to answer the next question:

Henry Home Furnishings has built high-end furniture for nearly forty years. However, the new owner, Anton, has found some degree of disorganization after touring the company headquarters. His uncle Henry has always focused on production - not data processing - and Anton is concerned. In several storage rooms, he has found paper files, disks, and old computers that appear to contain the

personal data of current and former employees and customers. Anton knows that a single break-in could irrevocably damage the company's relationship with its loyal customers. He intends to set a goal of guaranteed zero loss of personal information. To this end, Anton originally planned to place restrictions on who was admitted to the physical premises of the company. However, Kenneth - his uncle's vice president and longtime confidante - wants to hold off on Anton's idea in favor of converting any paper records held at the company to electronic storage. Kenneth believes this process would only take one or two years. Anton likes this idea; he envisions a password-protected system that only he and Kenneth can access.

Anton also plans to divest the company of most of its subsidiaries. Not only will this make his job easier, but it will simplify the management of the stored data. The heads of subsidiaries like the art gallery and kitchenware store down the street will be responsible for their own information management. Then, any unneeded subsidiary data still in Anton's possession can be destroyed within the next few years.

After learning of a recent security incident, Anton realizes that another crucial step will be notifying customers. Kenneth insists that two lost hard drives in question are not cause for concern; all of the data was encrypted and not sensitive in nature. Anton does not want to take any chances, however. He intends on sending notice letters to all employees and customers to be safe.

Anton must also check for compliance with all legislative, regulatory, and market requirements related to privacy protection. Kenneth oversaw the development of the company's online presence about ten years ago, but Anton is not confident about his understanding of recent online marketing laws. Anton is assigning another trusted employee with a law background the task of the compliance assessment. After a thorough analysis, Anton knows the company should be safe for another five years, at which time he can order another check.

Documentation of this analysis will show auditors due diligence.

Anton has started down a long road toward improved management of the company, but he knows the effort is worth it. Anton wants his uncle's legacy to continue for many years to come.

To improve the facility's system of data security, Anton should consider following through with the plan for which of the following?

- A. Employee access to electronic storage
- B. Customer communication
- C. Employee advisement regarding legal matters
- **D. Controlled access at the company headquarters**

**Answer: D**

#### NEW QUESTION # 55

If your organization has a recurring issue with colleagues not reporting personal data breaches, all of the following are advisable to do EXCEPT?

- A. Improve communication to reinforce to everyone that breaches must be reported and how they should be reported.
- B. Provide role-specific training to areas where breaches are happening so they are more aware.
- C. Review reporting activity on breaches to understand when incidents are being reported and when they are not to improve communication and training.
- **D. Distribute a phishing exercise to all employees to test their ability to recognize a threat attempt.**

**Answer: D**

Explanation:

Explanation

Distributing a phishing exercise is not advisable when attempting to address the issue of colleagues not reporting personal data breaches. Instead, the recommended steps are to review reporting activity on breaches, improve communication, and provide role-specific training to areas where breaches are happening. These steps will help to ensure that everyone is aware of their responsibilities and that they understand how to report a breach should one occur.

References:

\* <https://www.itgovernance.co.uk/blog/5-reasons-why-employees-dont-report-data-breaches/>

\* <https://www.ncsc.gov.uk/guidance/report-cyber-incident>

\* <https://www.ncsc.gov.uk/guidance/phishing-staff-awareness>

#### NEW QUESTION # 56

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 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.

Based on the scenario, Nationwide Grill needs to create better employee awareness of the company's privacy program by doing what?

- A. Improving inter-departmental cooperation.
- B. Communicating to the staff more often.
- **C. Varying the modes of communication.**
- D. Requiring acknowledgment of company memos.

**Answer: C**

Explanation:

This answer is the best way to create better employee awareness of the company's privacy program, as it can increase the effectiveness and retention of the information by appealing to different learning styles and preferences. Varying the modes of communication can include using different formats and channels, such as posters, emails, memos, videos, webinars, podcasts, newsletters, quizzes, games or interactive modules. Varying the modes of communication can also help to avoid information overload or duplication, which may cause employees to ignore or disregard the privacy messages. Reference: IAPP CIPM Study Guide, page 90; ISO/IEC 27002:2013, section 7.2.2

## NEW QUESTION # 57

What should a privacy professional keep in mind when selecting which metrics to collect?

- A. Metrics should reveal strategies for increasing company earnings.
- B. A variety of metrics should be collected before determining their specific functions.
- **C. The number of metrics should be limited at first.**
- D. Metrics should be reported to the public.

**Answer: C**

Explanation:

Explanation

A privacy professional should keep in mind that the number of metrics should be limited at first when selecting which metrics to collect. Metrics are quantitative measures that help evaluate the performance and effectiveness of a privacy program. However, collecting too many metrics can be overwhelming, confusing, and costly. Therefore, a privacy professional should start with a few key metrics that are relevant, meaningful, actionable, and aligned with the organization's privacy goals and priorities. These metrics can be refined and expanded over time as the privacy program matures and evolves. References: [Privacy Metrics], [Measuring Privacy Program Effectiveness]

## NEW QUESTION # 58

## 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. Gap analysis.
- **B. Return to investment.**
- C. Cost basis.
- D. Breach impact modeling.

**Answer: B**

## NEW QUESTION # 59

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