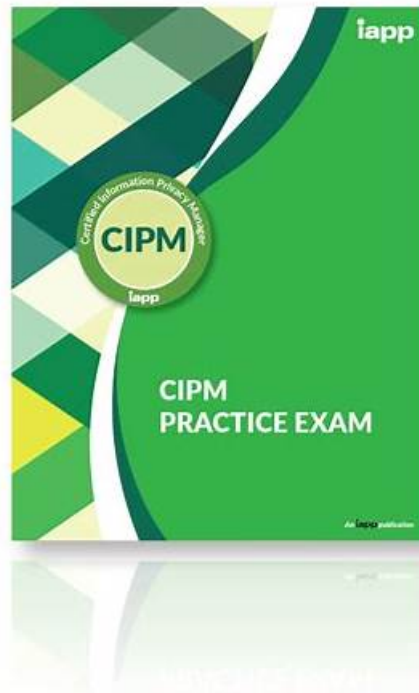


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The CIPM exam is designed to test your knowledge and expertise in privacy management. It is a rigorous exam that requires a comprehensive understanding of privacy laws, regulations, standards, and best practices. CIPM exam is divided into two parts: Part 1 consists of 80 multiple-choice questions, and Part 2 is a scenario-based exam with 35 multiple-choice questions.

To be eligible for the CIPM certification, candidates must have a minimum of two years of professional experience in privacy management. CIPM exam is a comprehensive test that consists of 90 multiple-choice questions that must be completed within 2.5 hours. CIPM Exam is available in multiple languages and can be taken online or in-person at a testing center. Certified Information Privacy Manager (CIPM) certification is valid for two years, after which individuals must re-take the exam or complete continuing education credits to maintain their certification. The CIPM certification is highly respected in the industry and can lead to increased job opportunities and higher salaries for those who hold it.

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IAPP CIPM Certification Exam is a valuable credential for professionals who are looking to advance their careers in privacy management. CIPM exam is suitable for individuals who have experience in privacy management and who are responsible for

implementing privacy policies and procedures in their organizations. Certified Information Privacy Manager (CIPM) certification demonstrates that the candidate has the knowledge and skills required to manage a privacy program effectively and to ensure compliance with privacy laws and regulations.

IAPP Certified Information Privacy Manager (CIPM) Sample Questions (Q199-Q204):

NEW QUESTION # 199

SCENARIO

Please use the following to answer the next QUESTION:

Perhaps Jack Kelly should have stayed in the U.S. He enjoys a formidable reputation inside the company, Special Handling Shipping, for his work in reforming certain "rogue" offices. Last year, news broke that a police sting operation had revealed a drug ring operating in the Providence, Rhode Island office in the United States. Video from the office's video surveillance cameras leaked to news operations showed a drug exchange between Special Handling staff and undercover officers.

In the wake of this incident, Kelly had been sent to Providence to change the "hands off" culture that upper management believed had let the criminal elements conduct their illicit transactions. After a few weeks under Kelly's direction, the office became a model of efficiency and customer service. Kelly monitored his workers' activities using the same cameras that had recorded the illegal conduct of their former co-workers.

Now Kelly has been charged with turning around the office in Cork, Ireland, another trouble spot. The company has received numerous reports of the staff leaving the office unattended. When Kelly arrived, he found that even when present, the staff often spent their days socializing or conducting personal business on their mobile phones. Again, he observed their behaviors using surveillance cameras. He issued written reprimands to six staff members based on the first day of video alone.

Much to Kelly's surprise and chagrin, he and the company are now under investigation by the Data Protection Commissioner of Ireland for allegedly violating the privacy rights of employees. Kelly was told that the company's license for the cameras listed facility security as their main use, but he does not know why this matters. He has pointed out to his superiors that the company's training programs on privacy protection and data collection mention nothing about surveillance video.

You are a privacy protection consultant, hired by the company to assess this incident, report on the legal and compliance issues, and recommend next steps.

Knowing that the regulator is now investigating, what would be the best step to take?

- A. If you know the organization is guilty, advise it to accept the punishment.
- B. Use your background and knowledge to set a course of action.
- **C. Consult an attorney experienced in privacy law and litigation.**
- D. Negotiate the terms of a settlement before formal legal action takes place.

Answer: C

Explanation:

This answer is the best step to take knowing that the regulator is now investigating, as it can help the organization to obtain legal advice and representation on how to respond to and cooperate with the investigation, as well as how to defend or resolve any potential claims or disputes that may arise from the incident. Consulting an attorney experienced in privacy law and litigation can also help the organization to understand its rights and obligations under the applicable laws and regulations, as well as the possible outcomes and consequences of the investigation. An attorney can also assist the organization in preparing and submitting any required documents or evidence, communicating with the regulator or other parties, negotiating a settlement or agreement, or challenging or appealing any decisions or actions taken by the regulator. Reference: IAPP CIPM Study Guide, page 871; ISO/IEC 27002:2013, section 16.1.5

NEW QUESTION # 200

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

- A. To enable regulators to understand trends and developments that may shape the law
- **B. To allow individuals to take any actions required to protect themselves from possible consequences**
- C. To ensure organizations have accountability for the sufficiency of their security measures
- D. To avoid financial penalties and legal liability

Answer: B

Explanation:

The main purpose in notifying data subjects of a data breach is to allow individuals to take any actions required to protect themselves from possible consequences, such as identity theft, fraud, or discrimination. This is consistent with the principle of transparency and

the right to information under the GDPR. The other options are not the main purpose of notification, although they may be secondary effects or benefits of the process. Reference:

Data protection impact assessments | ICO

[Art. 34 GDPR - Communication of a personal data breach to the data subject - GDPR.eu]

NEW QUESTION # 201

SCENARIO

Please use the following to answer the next QUESTION:

Manasa is a product manager at Omnipresent Omnimedia, where she is responsible for leading the development of the company's flagship product, the Handy Helper. The Handy Helper is an application that can be used in the home to manage family calendars, do online shopping, and schedule doctor appointments. After having had a successful launch in the United States, the Handy Helper is about to be made available for purchase worldwide.

The packaging and user guide for the Handy Helper indicate that it is a "privacy friendly" product suitable for the whole family, including children, but does not provide any further detail or privacy notice. In order to use the application, a family creates a single account, and the primary user has access to all information about the other users. Upon start up, the primary user must check a box consenting to receive marketing emails from Omnipresent Omnimedia and selected marketing partners in order to be able to use the application.

Sanjay, the head of privacy at Omnipresent Omnimedia, was working on an agreement with a European distributor of Handy Helper when he fielded many Questions about the product from the distributor. Sanjay needed to look more closely at the product in order to be able to answer the Questions as he was not involved in the product development process.

In speaking with the product team, he learned that the Handy Helper collected and stored all of a user's sensitive medical information for the medical appointment scheduler. In fact, all of the user's information is stored by Handy Helper for the additional purpose of creating additional products and to analyze usage of the product. This data is all stored in the cloud and is encrypted both during transmission and at rest.

Consistent with the CEO's philosophy that great new product ideas can come from anyone, all Omnipresent Omnimedia employees have access to user data under a program called Eureka. Omnipresent Omnimedia is hoping that at some point in the future, the data will reveal insights that could be used to create a fully automated application that runs on artificial intelligence, but as of yet, Eureka is not well-defined and is considered a long-term goal.

What administrative safeguards should be implemented to protect the collected data while in use by Manasa and her product management team?

- **A. Implement a policy restricting data access on a "need to know" basis.**
- B. Conduct a Privacy Impact Assessment (PIA) to evaluate the risks involved.
- C. Limit data transfers to the US by keeping data collected in Europe within a local data center.
- D. Document the data flows for the collected data.

Answer: A

Explanation:

An administrative safeguard that should be implemented to protect the collected data while in use by Manasa and her product management team is a policy restricting data access on a "need to know" basis. This means that only authorized personnel who have a legitimate business purpose for accessing the data should be able to do so. This would help to prevent unauthorized or unnecessary access, use, or disclosure of sensitive or personal data by internal or external parties. It would also reduce the risk of data breaches, theft, or loss that could compromise the confidentiality, integrity, and availability of the data. Reference: 3: HIPAA Security Series #2 - Administrative Safeguards - HHS.gov; 4: Administrative Safeguards of the Security Rule: What Are They?

NEW QUESTION # 202

The main reason the response to this incident should be integrated into the Business Continuity Plan (BCP) is because?

- A. The impact on the company's competitive advantage is potentially significant.
- B. The need for retraining employees will be paramount.
- C. The repercussions for the company could have significant environmental impacts.
- **D. Major stakeholders are involved from every critical area of the business.**

Answer: D

Explanation:

Comprehensive and Detailed Explanation:

A Business Continuity Plan (BCP) ensures that organizations can recover from disruptions and maintain essential functions. Major

stakeholders from every critical area must be involved to coordinate an effective response.

- * Option A (Environmental impacts) is relevant for physical disaster recovery but not directly for a data breach.
 - * Option B (Retraining employees) is important but does not justify integrating the incident into BCP.
 - * Option D (Competitive advantage loss) is a consequence but not the primary reason for BCP integration.
 - * Option C (Major stakeholders are involved from every critical area of the business) is the correct answer because a comprehensive response requires cross-functional collaboration, including IT, legal, HR, and compliance teams.
- Reference: CIPM Official Textbook, Module: Incident Response and Business Continuity - Section on Integrating Privacy into Business Continuity Planning.

NEW QUESTION # 203

SCENARIO

Please use the following to answer the next question:

You lead the privacy office for a company that handles information from individuals living in several countries throughout Europe and the Americas. You begin that morning's privacy review when a contracts officer sends you a message asking for a phone call. The message lacks clarity and detail, but you presume that data was lost.

When you contact the contracts officer, he tells you that he received a letter in the mail from a vendor stating that the vendor improperly shared information about your customers. He called the vendor and confirmed that your company recently surveyed exactly 2000 individuals about their most recent healthcare experience and sent those surveys to the vendor to transcribe it into a database, but the vendor forgot to encrypt the database as promised in the contract. As a result, the vendor has lost control of the data.

The vendor is extremely apologetic and offers to take responsibility for sending out the notifications. They tell you they set aside 2000 stamped postcards because that should reduce the time it takes to get the notice in the mail. One side is limited to their logo, but the other side is blank and they will accept whatever you want to write. You put their offer on hold and begin to develop the text around the space constraints. You are content to let the vendor's logo be associated with the notification.

The notification explains that your company recently hired a vendor to store information about their most recent experience at St. Sebastian Hospital's Clinic for Infectious Diseases. The vendor did not encrypt the information and no longer has control of it. All 2000 affected individuals are invited to sign-up for email notifications about their information. They simply need to go to your company's website and watch a quick advertisement, then provide their name, email address, and month and year of birth.

You email the incident-response council for their buy-in before 9 a.m. If anything goes wrong in this situation, you want to diffuse the blame across your colleagues. Over the next eight hours, everyone emails their comments back and forth. The consultant who leads the incident-response team notes that it is his first day with the company, but he has been in other industries for 45 years and will do his best. One of the three lawyers on the council causes the conversation to veer off course, but it eventually gets back on track. At the end of the day, they vote to proceed with the notification you wrote and use the vendor's postcards.

Shortly after the vendor mails the postcards, you learn the data was on a server that was stolen, and make the decision to have your company offer credit monitoring services. A quick internet search finds a credit monitoring company with a convincing name: Credit Under Lock and Key (CRUDLOK). Your sales rep has never handled a contract for 2000 people, but develops a proposal in about a day which says CRUDLOK will:

1. Send an enrollment invitation to everyone the day after the contract is signed.
2. Enroll someone with just their first name and the last-4 of their national identifier.
3. Monitor each enrollee's credit for two years from the date of enrollment.
4. Send a monthly email with their credit rating and offers for credit-related services at market rates.
5. Charge your company 20% of the cost of any credit restoration.

You execute the contract and the enrollment invitations are emailed to the 2000 individuals. Three days later you sit down and document all that went well and all that could have gone better. You put it in a file to reference the next time an incident occurs.

Regarding the notification, which of the following would be the greatest concern?

- A. Collecting more personally identifiable information than necessary to provide updates to the affected individuals.
- B. Using a postcard with the logo of the vendor who made the mistake instead of your company's logo.
- **C. Trusting a vendor to send out a notice when they already failed once by not encrypting the database.**
- D. Informing the affected individuals that data from other individuals may have also been affected.

Answer: C

NEW QUESTION # 204

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