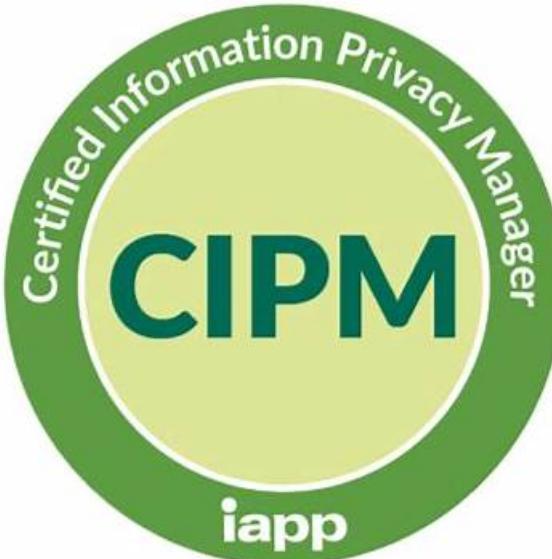


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IAPP CIPM Exam is a certification exam designed for professionals who are interested in data privacy management. CIPM exam covers various topics such as privacy regulations, privacy program management, and privacy operations. CIPM exam is designed for professionals who are responsible for managing privacy programs, including privacy officers, data protection officers, information security officers, and compliance officers. The IAPP CIPM Exam is a computer-based exam that consists of 90 multiple-choice questions and is a comprehensive assessment of the candidate's ability to manage privacy programs and ensure compliance with

privacy regulations.

IAPP CIPM Exam is a computer-based exam that consists of 90 multiple-choice questions. CIPM exam is timed, and candidates are given 2.5 hours to complete it. CIPM exam is offered in multiple languages, and the passing score is 300 out of 500. CIPM exam fee includes one year of IAPP membership, access to the IAPP website, and a digital badge to showcase the candidate's achievement.

IAPP Certified Information Privacy Manager (CIPM) Sample Questions (Q183-Q188):

NEW QUESTION # 183

An organization's internal audit team should do all of the following EXCEPT?

- A. Verify that technical measures are in place.
- B. Review how operations work in practice.
- C. Ensure policies are being adhered to.
- D. **Implement processes to correct audit failures.**

Answer: D

Explanation:

An organization's internal audit team should not implement processes to correct audit failures, as this is the responsibility of the management or the privacy office. The internal audit team should only verify that technical measures are in place, review how operations work in practice, and ensure policies are being adhered to. Implementing corrective actions would compromise the independence and objectivity of the internal audit team. Reference: CIPM Body of Knowledge, Domain III: Privacy Program Operational Life Cycle, Section A: Assess, Subsection 1: Privacy Assessments and Audits.

NEW QUESTION # 184

Your company provides a SaaS tool for B2B services and does not interact with individual consumers. A client's current employee reaches out with a right to delete request. what is the most appropriate response?

- A. Explain you are unable to process the request because business contact information and associated data is not covered under privacy rights laws.
- B. Process the request assuming that the individual understands the implications to their organization if their information is deleted.
- C. **Redirect the individual back to their employer to understand their rights and how this might impact access to company tools.**
- D. Forward the request to the contact on file for the client asking them how they would like you to proceed.

Answer: C

Explanation:

If your organization provides a SaaS tool for B2B services and does not interact with individual consumers, and a client's current employee reaches out with a right to delete request, the most appropriate response is to redirect the individual back to their employer to understand their rights and how this might impact access to company tools. This is because your organization is acting as a processor for the client, who is the controller of the employee's personal data. The controller is responsible for determining the purposes and means of processing personal data, as well as responding to data subject requests. The processor should only process personal data on behalf of and in accordance with the instructions of the controller. Therefore, you should not forward the request to the client, process the request without consulting the client, or deny the request based on business contact information being exempt from privacy rights laws^{1, 2}. References: CIPM - International Association of Privacy Professionals, Free CIPM Study Guide - International Association of Privacy Professionals

NEW QUESTION # 185

SCENARIO

Please use the following to answer the next QUESTION:

Martin Briseño is the director of human resources at the Canyon City location of the U.S. hotel chain Pacific Suites. In 1998, Briseño 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 Briseño 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 Briseño'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. Briseño 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 must Pacific Suite's primary focus be as it manages this security breach?

- A. Investigating the cause and assigning responsibility
- B. Determining whether the affected individuals should be notified
- C. Maintaining operations and preventing publicity
- D. **Minimizing the amount of harm to the affected individuals**

Answer: D

NEW QUESTION # 186

Which of the following is TRUE about the Data Protection Impact Assessment (DPIA) process as required under the General Data Protection Regulation (GDPR)?

- A. **The DPIA must include a description of the proposed processing operation and its purpose.**
- B. The DPIA report must be published to demonstrate the transparency of the data processing
- C. The DPIA result must be reported to the corresponding supervisory authority.
- D. The DPIA is required if the processing activity entails risk to the rights and freedoms of an EU individual.

Answer: A

Explanation:

The statement that is true about the Data Protection Impact Assessment (DPIA) process as required under the General Data Protection Regulation (GDPR) is that the DPIA must include a description of the proposed processing operation and its purpose. According to Article 35(7) of the GDPR, a DPIA shall contain at least:

* "a systematic description of the envisaged processing operations and the purposes of the processing";

* "an assessment of the necessity and proportionality of the processing operations in relation to the purposes";

- * "an assessment of the risks to the rights and freedoms of data subjects";
- * "the measures envisaged to address the risks";
- * "safeguards", "security measures";
- * "mechanisms to ensure the protection of personal data";
- * "to demonstrate compliance with this Regulation taking into account the rights and legitimate interests of data subjects and other persons concerned"⁵ Therefore, a DPIA must include a description of what data processing activities are planned and why they are needed as part of its content. This helps to provide a clear overview of the processing operation and its objectives as well as to assess its necessity and proportionality in relation to its purposes⁶ References: 5: [General Data Protection Regulation (GDPR) - Official Legal Text], Article 35(7); 6: Data protection impact assessments | ICO

NEW QUESTION # 187

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!" You see evidence that company employees routinely circumvent the privacy officer in developing new initiatives.

How can you best draw attention to the scope of this problem?

- A. Hold discussions with the department head of anyone who fails to consult with the privacy officer.
- B. Take your concerns straight to the Chief Executive Officer.
- C. Develop a metric showing the number of initiatives launched without consultation and include it in reports, presentations, and consultation.
- D. Insist upon one-on-one consultation with each person who works around the privacy officer.

Answer: A

NEW QUESTION # 188

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