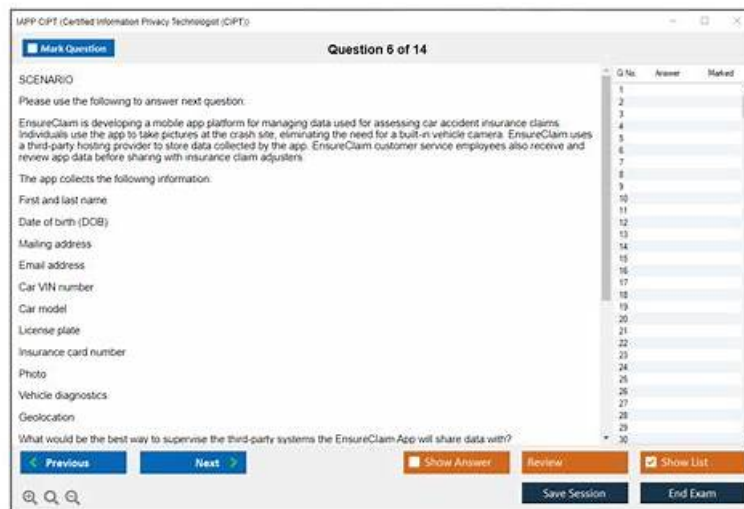


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## IAPP Certified Information Privacy Technologist (CIPT) Sample Questions (Q60-Q65):

### NEW QUESTION # 60

#### SCENARIO

Clean-Q is a company that offers house-hold and office cleaning services. The company receives requests from consumers via their website and telephone, to book cleaning services. Based on the type and size of service, Clean-Q then contracts individuals that are registered on its resource database - currently managed in-house by Clean-Q IT Support. Because of Clean-Q's business model, resources are contracted as needed instead of permanently employed.

The table below indicates some of the personal information Clean-Q requires as part of its business operations:

Category	Types of Personal Information
Customers	Name, address (location), contact information, billing information
Resources (contracted)	Name, contact information, banking details, address

Clean-Q has an internal employee base of about 30 people. A recent privacy compliance exercise has been conducted to align employee data management and human resource functions with applicable data protection regulation. Therefore, the Clean-Q permanent employee base is not included as part of this scenario.

With an increase in construction work and housing developments, Clean-Q has had an influx of requests for cleaning services. The demand has overwhelmed Clean-Q's traditional supply and demand system that has caused some overlapping bookings.

In a business strategy session held by senior management recently, Clean-Q invited vendors to present potential solutions to their current operational issues. These vendors included Application developers and Cloud-Q's solution providers, presenting their proposed solutions and platforms.

The Managing Director opted to initiate the process to integrate Clean-Q's operations with a cloud solution (LeadOps) that will provide the following solution one single online platform: A web interface that Clean-Q accesses for the purposes of resource and customer management. This would entail uploading resource and customer information.

\* A customer facing web interface that enables customers to register, manage and submit cleaning service requests online.

\* A resource facing web interface that enables resources to apply and manage their assigned jobs.

\* An online payment facility for customers to pay for services.

If Clean-Q were to utilize LeadOps' services, what is a contract clause that may be included in the agreement entered into with LeadOps?

- A. A provision that holds LeadOps liable for a data breach involving Clean-Q's information.
- **B. A provision that allows Clean-Q to conduct audits of LeadOps' information processing and information security environment, at LeadOps' cost and at any time that Clean-Q requires.**
- C. A provision that requires LeadOps to notify Clean-Q of any suspected breaches of information that involves customer or resource information managed on behalf of Clean-Q.
- D. A provision prescribing technical and organizational controls that LeadOps must implement.

**Answer: B**

#### NEW QUESTION # 61

A retail store originally collected customer data in its app to provide coupons and special offers to those customers. The store now wants to sell the customer data to product distributors in exchange for better wholesale pricing on its products. What is the best way for the store to proceed?

- A. Create an option in the app that allows the customer to opt-out of the data sale.
- B. Update the privacy notice in the app that allows the store to sell the customer data.
- **C. Use an app pop-up to inform the user of the new use and obtain their consent before selling the data.**
- D. Require the distributor to notify the customer of the data sale via email.

**Answer: C**

Explanation:

CIPT emphasizes purpose limitation and notice + consent when an organization wants to introduce a new, incompatible purpose for personal data.

In this scenario:

\* Original purpose: providing coupons/offers

\* New purpose: selling customer data to distributors

\* These purposes are not compatible under privacy principles

\* This triggers a requirement for fresh, explicit consent

CIPT, GDPR, OECD, NIST PF all emphasize:

# A new or expanded use that materially changes the expectation of the user requires active, informed consent at the point of change.

Thus, the correct approach is:

\* Give just-in-time notice (pop-up)

\* Explain the new purpose (data sale)

\* Request explicit opt-in consent

\* Do not proceed without it

Why the other options are incorrect:

\* A: Shifts responsibility to the distributor - does not satisfy transparency or consent requirements.

\* B: Opt-out is insufficient for a new, high-risk use like selling personal data. Opt-in is required.

\* C: Updating the privacy notice alone is not enough - users must actively consent to a new purpose.

# Correct: D

## NEW QUESTION # 62

What is the main function of a breach response center?

- A. Detecting internal security attacks.
- B. Interfacing with privacy regulators and governmental bodies.
- **C. Addressing privacy incidents.**
- D. Providing training to internal constituencies.

**Answer: C**

Explanation:

The main function of a breach response center is to address privacy incidents<sup>1</sup>. A breach response center is a team of experts that conducts a comprehensive breach response when a data breach occurs<sup>1</sup>. The breach response center may include forensics, legal, information security, information technology, operations, human resources, communications, investor relations, and management<sup>1</sup>. The other options are not the main function of a breach response center, but rather possible tasks or roles that may be involved in a breach response.

## NEW QUESTION # 63

### SCENARIO

Please use the following to answer the next question:

Light Blue Health (LBH) is a healthcare technology company developing a new web and mobile application that collects personal health information from electronic patient health records. The application will use machine learning to recommend potential medical treatments and medications based on information collected from anonymized electronic health records. Patient users may also share health data collected from other mobile apps with the LBH app.

The application requires consent from the patient before importing electronic health records into the application and sharing it with their authorized physicians or healthcare provider. The patient can then review and share the recommended treatments with their physicians securely through the app. The patient user may also share location data and upload photos in the app. The patient user may also share location data and upload photos in the app for a healthcare provider to review along with the health record. The patient may also delegate access to the app.

LBH's privacy team meets with the Application development and Security teams, as well as key business stakeholders on a periodic basis. LBH also implements Privacy by Design (PbD) into the application development process.

The Privacy Team is conducting a Privacy Impact Assessment (PIA) to evaluate privacy risks during development of the application. The team must assess whether the application is collecting descriptive, demographic or any other user related data from the electronic health records that are not needed for the purposes of the application. The team is also reviewing whether the application may collect additional personal data for purposes for which the user did not provide consent.

The Privacy Team is conducting a Privacy Impact Assessment (PIA) for the new Light Blue Health application currently in development. Which of the following best describes a risk that is likely to result in a privacy breach?

- **A. Limiting access to the app to authorized personnel.**
- B. Not encrypting the health record when it is transferred to the Light Blue Health servers.
- C. Insufficiently deleting personal data after an account reaches its retention period.
- D. Including non-transparent policies, terms and conditions in the app.

**Answer: A**

## NEW QUESTION # 64

What Privacy by Design (PbD) element should include a de-identification or deletion plan?

- A. Security

- **B. Retention.**
- C. Categorization.
- D. Remediation.

**Answer: B**

## NEW QUESTION # 65

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