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Privacy management is becoming increasingly important in today's digital age, with the rise of data breaches and cybercrime. The CIPM certification exam covers a broad range of topics related to privacy management, including the development and implementation of privacy policies, procedures, and standards, privacy risk assessment and management, privacy program governance, and privacy training and awareness. CIPM Exam is based on the IAPP's internationally recognized body of knowledge for privacy professionals, which is regularly updated to reflect the latest developments in the field.

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IAPP Certified Information Privacy Manager (CIPM) Sample Questions (Q139-Q144):

NEW QUESTION # 139

All of the following are accurate regarding the use of technical security controls EXCEPT?

- A. Most privacy legislation lists the types of technical security controls that must be implemented.
- B. Technical security controls are part of a data governance strategy.
- C. Technical security controls deployed for one jurisdiction often satisfy another jurisdiction.
- D. A person with security knowledge should be involved with the deployment of technical security controls.

Answer: A

Explanation:

Comprehensive and Detailed Explanation:

While privacy laws require appropriate technical security controls, most laws do not specify exactly which controls must be used. Instead, they mandate organizations to adopt "appropriate technical and organizational measures".

Option A (Part of data governance strategy) is correct because security controls support data protection and privacy governance.

Option B (Often satisfy multiple jurisdictions) is correct since common security measures (e.g., encryption, access controls) align with various privacy regulations.

Option D (Security expert involvement) is correct because deploying security controls requires specialized knowledge.

NEW QUESTION # 140

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. Metrics should be reported to the public.
- D. The number of metrics should be limited at first.

Answer: D

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. Reference: [Privacy Metrics], [Measuring Privacy Program Effectiveness]

NEW QUESTION # 141

SCENARIO

Please use the following to answer the next QUESTION:

Penny has recently joined Ace Space, a company that sells homeware accessories online, as its new privacy officer. The company is based in California but thanks to some great publicity from a social media influencer last year, the company has received an influx of

sales from the EU and has set up a regional office in Ireland to support this expansion. To become familiar with Ace Space's practices and assess what her privacy priorities will be, Penny has set up meetings with a number of colleagues to hear about the work that they have been doing and their compliance efforts.

Penny's colleague in Marketing is excited by the new sales and the company's plans, but is also concerned that Penny may curtail some of the growth opportunities he has planned. He tells her "I heard someone in the breakroom talking about some new privacy laws but I really don't think it affects us. We're just a small company. I mean we just sell accessories online, so what's the real risk?" He has also told her that he works with a number of small companies that help him get projects completed in a hurry. "We've got to meet our deadlines otherwise we lose money. I just sign the contracts and get Jim in finance to push through the payment. Reviewing the contracts takes time that we just don't have." In her meeting with a member of the IT team, Penny has learned that although Ace Space has taken a number of precautions to protect its website from malicious activity, it has not taken the same level of care of its physical files or internal infrastructure. Penny's colleague in IT has told her that a former employee lost an encrypted USB key with financial data on it when he left. The company nearly lost access to their customer database last year after they fell victim to a phishing attack. Penny is told by her IT colleague that the IT team "didn't know what to do or who should do what. We hadn't been trained on it but we're a small team though, so it worked out OK in the end." Penny is concerned that these issues will compromise Ace Space's privacy and data protection.

Penny is aware that the company has solid plans to grow its international sales and will be working closely with the CEO to give the organization a data "shake up". Her mission is to cultivate a strong privacy culture within the company.

Penny has a meeting with Ace Space's CEO today and has been asked to give her first impressions and an overview of her next steps.

What is the best way for Penny to understand the location, classification and processing purpose of the personal data Ace Space has?

- A. Analyze the data inventory to map data flows
- B. Review all cloud contracts to identify the location of data servers used
- C. Conduct a Privacy Impact Assessment for the company
- **D. Audit all vendors' privacy practices and safeguards**

Answer: D

NEW QUESTION # 142

Under the GDPR, when the applicable lawful basis for the processing of personal data is a legal obligation with which the controller must comply, which right can the data subject exercise?

- A. Right to erasure.
- B. Right to withdraw consent.
- C. Right to data portability.
- **D. Right to restriction.**

Answer: D

Explanation:

Under the GDPR, when the applicable lawful basis for the processing of personal data is a legal obligation with which the controller must comply, the data subject can exercise the right to restriction. This means that the data subject can request the controller to limit the processing of their personal data in certain circumstances, such as when they contest the accuracy or lawfulness of the processing. The other rights are not applicable in this case, as they are either dependent on consent (right to withdraw consent and right to data portability) or subject to exceptions (right to erasure). Reference: GDPR, Articles 6(1), 18, 21(1).

NEW QUESTION # 143

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

Answer: A

NEW QUESTION # 144

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