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IAPP CIPM (Certified Information Privacy Manager) Exam is a certification program designed for professionals working in the field of data protection and privacy. It is a globally recognized certification that demonstrates proficiency in the management and implementation of privacy programs and practices. Certified Information Privacy Manager (CIPM) certification is ideal for professionals who are responsible for managing and implementing privacy programs, policies, and procedures within their organizations.

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The International Association of Privacy Professionals (IAPP) is recognized globally as the leading association for professionals in the field of privacy. Over the years, the IAPP has provided important education, training, and opportunities for privacy professionals to network with colleagues around the world. One of the most valuable certifications that the IAPP offers is the Certified Information Privacy Manager (CIPM) certification.

## IAPP Certified Information Privacy Manager (CIPM) Sample Questions (Q75-Q80):

### NEW QUESTION # 75

#### SCENARIO

Please use the following to answer the next QUESTION:

It's just what you were afraid of. Without consulting you, the information technology director at your organization launched a new initiative to encourage employees to use personal devices for conducting business. The initiative made purchasing a new, high-specification laptop computer an attractive option, with discounted laptops paid for as a payroll deduction spread over a year of paychecks. The organization is also paying the sales taxes. It's a great deal, and after a month, more than half the organization's employees have signed on and acquired new laptops. Walking through the facility, you see them happily customizing and comparing notes on their new computers, and at the end of the day, most take their laptops with them, potentially carrying personal data to their homes or other unknown locations. It's enough to give you data-protection nightmares, and you've pointed out to the information technology Director and many others in the organization the potential hazards of this new practice, including the inevitability of eventual data loss or theft.

Today you have in your office a representative of the organization's marketing department who shares with you, reluctantly, a story with potentially serious consequences. The night before, straight from work, with laptop in hand, he went to the Bull and Horn Pub to play billiards with his friends. A fine night of sport and socializing began, with the laptop "safely" tucked on a bench, beneath his jacket. Later that night, when it was time to depart, he retrieved the jacket, but the laptop was gone. It was not beneath the bench or on another bench nearby. The waitstaff had not seen it. His friends were not playing a joke on him. After a sleepless night, he confirmed it this morning, stopping by the pub to talk to the cleanup crew. They had not found it. The laptop was missing. Stolen, it seems. He looks at you, embarrassed and upset.

You ask him if the laptop contains any personal data from clients, and, sadly, he nods his head, yes. He believes it contains files on about 100 clients, including names, addresses and governmental identification numbers. He sighs and places his head in his hands in despair.

In order to determine the best course of action, how should this incident most productively be viewed?

- A. As a potential compromise of personal information through unauthorized access.
- B. As an incident that requires the abrupt initiation of a notification campaign.
- C. As the premeditated theft of company data, until shown otherwise.
- D. As the accidental loss of personal property containing data that must be restored.

**Answer: A**

Explanation:

This answer recognizes the risk of data breach that may result from the loss of the laptop, as it may expose the personal information of the clients to unauthorized or unlawful processing. A data breach is defined as a security incident that leads to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed. A data breach may have serious consequences for the individuals whose data is compromised, such as identity theft, fraud, discrimination, financial loss or reputational damage. Therefore, it is important to view this incident as a potential compromise of personal information and take appropriate measures to contain, assess and mitigate the impact of the breach. Reference: IAPP CIPM Study Guide, page 86; ISO/IEC 27002:2013, section 16.1.1

### NEW QUESTION # 76

Your company wants to convert paper records that contain customer personal information into electronic form, upload the records into a new third-party marketing tool and then merge the customer personal information in the marketing tool with information from other applications.

As the Privacy Officer, which of the following should you complete to effectively make these changes?

- A. A Personal Data Inventory.
- B. A Privacy Impact Assessment (PIA).
- C. A Privacy Threshold Analysis (PTA).
- D. A Record of Authority.

**Answer: B**

Explanation:

Explanation

A Privacy Impact Assessment (PIA) is a process that helps an organization identify and evaluate the potential privacy risks and impacts of a new or existing project, program, system, or service that involves the collection, use, disclosure, or retention of personal

information. A PIA also helps an organization identify and implement appropriate measures to mitigate or eliminate those risks and impacts, and ensure compliance with applicable privacy laws, regulations, and standards. A PIA should be completed to effectively make changes that involve customer personal information, such as converting paper records into electronic form, uploading the records into a new third-party marketing tool, and merging the customer personal information in the marketing tool with information from other applications. A PIA can help an organization assess the necessity, proportionality, and legality of the proposed changes, as well as the potential privacy risks to the customers and the organization, such as unauthorized access, disclosure, modification, or loss of personal information, identity theft, fraud, reputational damage, or legal liability. A PIA can also help an organization implement appropriate measures to mitigate or eliminate those risks, such as data minimization, encryption, anonymization, pseudonymization, consent management, access control, security safeguards, contractual clauses, data protection impact assessments (DPIAs), data subject rights, breach notification procedures, and privacy policies.

References:

\* CIPM Body of Knowledge (2021), Domain IV: Privacy Program Operational Life Cycle, Section C:

Monitoring and Managing Program Performance Subsection 1: Privacy Impact Assessments<sup>1</sup>

\* CIPM Study Guide (2021), Chapter 9: Monitoring and Managing Program Performance Section 9.1: Privacy Impact Assessments<sup>2</sup>

\* CIPM Textbook (2019), Chapter 9: Monitoring and Managing Program Performance Section 9.1:

Privacy Impact Assessments<sup>3</sup>

\* CIPM Practice Exam (2021), Question 1464

## NEW QUESTION # 77

### 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 process could most effectively be used to add privacy protections to a new, comprehensive program being developed at Consolidated?

- A. Privacy Step Assessment.
- **B. Privacy by Design.**
- C. Information Security Planning.
- D. Innovation Privacy Standards.

**Answer: B**

Explanation:

This is a process that embeds privacy protections into the design and development of new technologies, systems, products or services that involve personal data. It ensures that privacy is considered at every stage of the development process, from conception to completion, and that the privacy principles are integrated into the core functionality of the program.

## NEW QUESTION # 78

What is the main function of the Asia-Pacific Economic Cooperation Privacy Framework?

- A. Enabling regional data transfers.
- B. Marketing privacy protection technologies developed in the region.
- C. Protecting data from parties outside the region.
- D. Establishing legal requirements for privacy protection in the region.

**Answer: A**

Explanation:

The main function of the Asia-Pacific Economic Cooperation Privacy Framework is enabling regional data transfers while protecting information privacy across APEC member economies. The Framework promotes a flexible approach to information privacy protection that avoids the creation of unnecessary barriers to information flows<sup>3</sup> It is based on a set of common privacy principles that are consistent with the core values of the OECD Guidelines on the Protection of Privacy and Transborder Flows of Personal Data<sup>3</sup> The Framework also provides guidance for domestic implementation and international implementation of the privacy principles through various mechanisms, such as cross-border privacy rules (CBPRs), accountability agents, regulators, enforcement cooperation, and capacity building<sup>3</sup> The Framework aims to facilitate the safe transfer of information between economies, enhance consumer trust and confidence in online transactions and information networks, encourage the use of electronic data to enhance and expand business opportunities, and provide technical assistance to economies that have yet to address privacy from a regulatory or policy perspective<sup>4</sup> Reference: 3: APEC PRIVACY PRINCIPLES; 4: APEC Data Privacy Pathfinder

## NEW QUESTION # 79

### SCENARIO

Please use the following to answer the next QUESTION:

Your organization, the Chicago (U.S.)-based Society for Urban Greenspace, has used the same vendor to operate all aspects of an online store for several years. As a small nonprofit, the Society cannot afford the higher-priced options, but you have been relatively satisfied with this budget vendor, Shopping Cart Saver (SCS). Yes, there have been some issues. Twice, people who purchased items from the store have had their credit card information used fraudulently subsequent to transactions on your site, but in neither case did the investigation reveal with certainty that the Society's store had been hacked. The thefts could have been employee-related.

Just as disconcerting was an incident where the organization discovered that SCS had sold information it had collected from customers to third parties. However, as Jason Roland, your SCS account representative, points out, it took only a phone call from you to clarify expectations and the "misunderstanding" has not occurred again.

As an information-technology program manager with the Society, the role of the privacy professional is only one of many you play. In all matters, however, you must consider the financial bottom line. While these problems with privacy protection have been significant, the additional revenues of sales of items such as shirts and coffee cups from the store have been significant. The Society's operating budget is slim, and all sources of revenue are essential.

Now a new challenge has arisen. Jason called to say that starting in two weeks, the customer data from the store would now be stored on a data cloud. "The good news," he says, "is that we have found a low-cost provider in Finland, where the data would also be held. So, while there may be a small charge to pass through to you, it won't be exorbitant, especially considering the advantages of a cloud." Lately, you have been hearing about cloud computing and you know it's fast becoming the new paradigm for various applications. However, you have heard mixed reviews about the potential impacts on privacy protection. You begin to research and discover that a number of the leading cloud service providers have signed a letter of intent to work together on shared conventions and technologies for privacy protection. You make a note to find out if Jason's Finnish provider is signing on.

What is the best way for your vendor to be clear about the Society's breach notification expectations?

- A. Include notification provisions in the vendor contract
- B. Send a memorandum of understanding on breach notification
- C. Arrange regular telephone check-ins reviewing expectations
- D. Email the regulations that require breach notifications

**Answer: A**

Explanation:

Explanation

This answer is the best way for Albert's vendor to be clear about the Society's breach notification expectations, as it can establish clear and binding terms and conditions for both parties regarding their roles and responsibilities for handling any data security incidents or breaches. Including notification provisions in the vendor contract can help to define what constitutes a breach, how it should be detected, reported and investigated, what information should be provided to the organization and within what time frame, what actions should be taken to mitigate or resolve the breach, and what consequences or liabilities may arise from the breach. The contract can also specify that the vendor must cooperate and coordinate with the organization in any breach notification activities to the relevant authorities, customers, partners or stakeholders.

## NEW QUESTION # 80

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