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IAPP Certified Information Privacy Manager (CIPM) Sample Questions (Q22-Q27):

NEW QUESTION # 22
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 Record of Authority.
- B. A Personal Data Inventory.
- C. A Privacy Impact Assessment (PIA).
- D. A Privacy Threshold Analysis (PTA).

Answer: C

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 Assessments1
* CIPM Study Guide (2021), Chapter 9: Monitoring and Managing Program Performance Section 9.1:
Privacy Impact Assessments2
* CIPM Textbook (2019), Chapter 9: Monitoring and Managing Program Performance Section 9.1:
Privacy Impact Assessments3
* CIPM Practice Exam (2021), Question 1464

NEW QUESTION # 23
SCENARIO
Please use the following to answer the next question:
Martin Briseno is the director of human resources at the Canyon City location of the U.S. hotel chain Pacific Suites. In 1998, Briseno 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 Briseno 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 Briseno'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. Briseno 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.

How would a strong data life cycle management policy have helped prevent the breach?

- A. Information would have been categorized and assigned a deadline for destruction
- B. Information would have been ranked according to importance and stored in separate locations
- C. The most sensitive information would have been immediately erased and destroyed
- D. The most important information would have been regularly assessed and tested for security

Answer: A

NEW QUESTION # 24

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 element of the Privacy by Design (PbD) framework might the Handy Helper violate?

- A. Failure to observe data localization requirements.
- B. Failure to implement the least privilege access standard.
- C. Failure to obtain opt-in consent to marketing.
- D. Failure to integrate privacy throughout the system development life cycle.

Answer: A

NEW QUESTION # 25

Why were the nongovernmental privacy organizations, Electronic Frontier Foundation (EFF) and Electronic Privacy Information Center (EPIC), established?

- A. To promote security on the Internet through strong encryption
- B. To promote consumer confidence in the Internet industry
- C. To protect civil liberties and raise consumer awareness
- D. To improve the user experience during online shopping

Answer: C

NEW QUESTION # 26
Which most accurately describes the reasons an organization will conduct a PIA?

- A. To establish an inventory of its data processing activities in compliance with Article 30 of the GDPR.
- B. To identify and reduce the privacy risks to individuals at the commencement of a project.
- C. To analyze the impact of an incident response and determine next steps.
- D. To assess an organization's compliance with applicable laws, regulations, standards, and internal procedures.

Answer: B

Explanation:
Step-by-Step Comprehensive Detailed Explanation with All Information Privacy Manager CIPM Study Guide References A Privacy Impact Assessment (PIA) is conducted to identify and mitigate privacy risks. Let's review the options:
A). To assess compliance with applicable laws, regulations, standards, and procedures:
This describes an audit or compliance assessment, not the primary purpose of a PIA.
B). To establish an inventory of its data processing activities in compliance with Article 30 of the GDPR:
This aligns with the GDPR requirement for maintaining records of processing activities (ROPA), but it is not the primary focus of a PIA.
C). To identify and reduce the privacy risks to individuals at the commencement of a project:
This is the core purpose of a PIA, which aims to evaluate and minimize risks to individuals' data privacy early in a project's lifecycle.
D). To analyze the impact of an incident response and determine next steps:
This describes a post-breach analysis, not the purpose of a PIA.
CIPM Study Guide References:
Privacy Program Operational Life Cycle - "Assess" phase emphasizes PIAs as tools for identifying and mitigating risks to personal data.
GDPR compliance guidance also identifies PIAs as necessary for high-risk processing activities under Article 35.

NEW QUESTION # 27
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