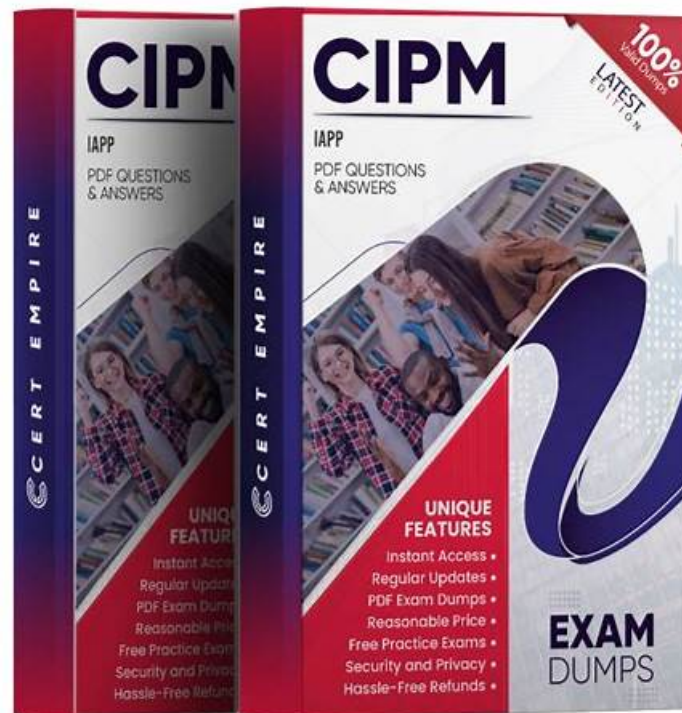


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By obtaining the CIPM Certification, professionals can demonstrate their commitment to privacy management and their ability to manage privacy programs effectively. Certified Information Privacy Manager (CIPM) certification is recognized globally and can

open up new career opportunities for individuals in the privacy management field. The CIPM certification is offered by the International Association of Privacy Professionals (IAPP), which is the world's largest association of privacy professionals. The IAPP offers a range of certifications and training programs for privacy professionals, including the CIPP (Certified Information Privacy Professional) and the CIPT (Certified Information Privacy Technologist) certifications.

## **IAPP Certified Information Privacy Manager (CIPM) Sample Questions (Q227-Q232):**

### **NEW QUESTION # 227**

How are individual program needs and specific organizational goals identified in privacy framework development?

- **A. Through creation of the business case.**
- B. By employing an industry-standard needs analysis.
- C. Through conversations with the privacy team.
- D. By employing metrics to align privacy protection with objectives.

**Answer: A**

Explanation:

The creation of the business case is the first step in privacy framework development, as it helps to identify the individual program needs and specific organizational goals. The business case is a document that outlines the rationale, objectives, benefits, costs, risks, and alternatives for implementing a privacy program. It also helps to communicate the value of privacy to stakeholders and gain their support. The other options are subsequent steps in privacy framework development, after the business case has been established.

Reference: CIPM Study Guide, page 15.

### **NEW QUESTION # 228**

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

**Answer: B**

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<sup>1, 2</sup>. References: CIPM - International Association of Privacy Professionals, Free CIPM Study Guide - International Association of Privacy Professionals

### **NEW QUESTION # 229**

SCENARIO

Please use the following to answer the next QUESTION:

As they company's new chief executive officer, Thomas Goddard wants to be known as a leader in data protection. Goddard recently served as the chief financial officer of Hoopy.com, a pioneer in online video viewing with millions of users around the world. Unfortunately, Hoopy is infamous within privacy protection circles for its ethically questionable practices, including unauthorized sales of personal data to marketers. Hoopy also was the target of credit card data theft that made headlines around the world, as at least two million credit card numbers were thought to have been pilfered despite the company's claims that "appropriate" data protection

safeguards were in place. The scandal affected the company's business as competitors were quick to market an increased level of protection while offering similar entertainment and media content. Within three weeks after the scandal broke, Hoopy founder and CEO Maxwell Martin, Goddard's mentor, was forced to step down.

Goddard, however, seems to have landed on his feet, securing the CEO position at your company, Medialite, which is just emerging from its start-up phase. He sold the company's board and investors on his vision of Medialite building its brand partly on the basis of industry-leading data protection standards and procedures. He may have been a key part of a lapsed or even rogue organization in matters of privacy but now he claims to be reformed and a true believer in privacy protection. In his first week on the job, he calls you into his office and explains that your primary work responsibility is to bring his vision for privacy to life. But you also detect some reservations. "We want Medialite to have absolutely the highest standards," he says. "In fact, I want us to be able to say that we are the clear industry leader in privacy and data protection. However, I also need to be a responsible steward of the company's finances. So, while I want the best solutions across the board, they also need to be cost effective." You are told to report back in a week's time with your recommendations. Charged with this ambiguous mission, you depart the executive suite, already considering your next steps.

You are charged with making sure that privacy safeguards are in place for new products and initiatives. What is the best way to do this?

- A. Develop a plan for introducing privacy protections into the product development stage
- B. Conduct a gap analysis after deployment of new products, then mend any gaps that are revealed
- C. Hold a meeting with stakeholders to create an interdepartmental protocol for new initiatives
- D. Institute Privacy by Design principles and practices across the organization

**Answer: A**

#### NEW QUESTION # 230

Which of the following is an example of Privacy by Design (PbD)?

- A. The information technology group uses privacy considerations to inform the development of new networking software.
- B. A company hires a professional to structure a privacy program that anticipates the increasing demands of new laws.
- C. A labor union insists that the details of employers' data protection methods be documented in a new contract.
- D. The human resources group develops a training program from employees to become certified in privacy policy.

**Answer: C**

#### NEW QUESTION # 231

##### SCENARIO

Please use the following to answer the next QUESTION:

Perhaps Jack Kelly should have stayed in the U.S. He enjoys a formidable reputation inside the company, Special Handling Shipping, for his work in reforming certain "rogue" offices. Last year, news broke that a police sting operation had revealed a drug ring operating in the Providence, Rhode Island office in the United States. Video from the office's video surveillance cameras leaked to news operations showed a drug exchange between Special Handling staff and undercover officers.

In the wake of this incident, Kelly had been sent to Providence to change the "hands off" culture that upper management believed had let the criminal elements conduct their illicit transactions. After a few weeks under Kelly's direction, the office became a model of efficiency and customer service. Kelly monitored his workers' activities using the same cameras that had recorded the illegal conduct of their former co-workers.

Now Kelly has been charged with turning around the office in Cork, Ireland, another trouble spot. The company has received numerous reports of the staff leaving the office unattended. When Kelly arrived, he found that even when present, the staff often spent their days socializing or conducting personal business on their mobile phones. Again, he observed their behaviors using surveillance cameras. He issued written reprimands to six staff members based on the first day of video alone.

Much to Kelly's surprise and chagrin, he and the company are now under investigation by the Data Protection Commissioner of Ireland for allegedly violating the privacy rights of employees. Kelly was told that the company's license for the cameras listed facility security as their main use, but he does not know why this matters. He has pointed out to his superiors that the company's training programs on privacy protection and data collection mention nothing about surveillance video.

You are a privacy protection consultant, hired by the company to assess this incident, report on the legal and compliance issues, and recommend next steps.

Knowing that the regulator is now investigating, what would be the best step to take?

- A. Consult an attorney experienced in privacy law and litigation.
- B. If you know the organization is guilty, advise it to accept the punishment.
- C. Negotiate the terms of a settlement before formal legal action takes place.

- D. Use your background and knowledge to set a course of action.

**Answer: A**

## NEW QUESTION # 232

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