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The Certified Information Privacy Manager (CIPM) certification is recognized globally and is highly valued by organizations that are looking to hire or promote individuals who have demonstrated their expertise in privacy management. It is a great way for professionals to differentiate themselves from others in the field and to show their commitment to privacy and data protection.

IAPP Certified Information Privacy Manager (CIPM) Sample Questions (Q215-Q220):

NEW QUESTION # 215

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?

How can Consolidated's privacy training program best be further developed?

- A. By using industry standard off-the-shelf programs
- B. By adopting e-learning to reduce the need for instructors
- **C. Through targeted curricula designed for specific departments**
- D. Through a review of recent data breaches

Answer: C

NEW QUESTION # 216

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

Answer: D

Explanation:

Explanation

The Handy Helper might violate the element of the Privacy by Design (PbD) framework that requires integrating privacy throughout the system development life cycle. According to the PbD framework, privacy should be embedded into the design and architecture of IT systems and business practices, not added as an afterthought¹. This means that privacy should be considered at every stage of the system development life cycle, from planning to analysis to design to development to implementation to maintenance². However, the Handy Helper seems to have been developed without involving Sanjay, the head of privacy, or conducting a privacy impact assessment (PIA) to identify and mitigate potential privacy risks³. The product also lacks a clear and transparent privacy notice that informs users about what data is collected, how it is used, where it is stored, who has access to it, and what choices they have⁴. These issues could expose the product to legal and reputational challenges, especially in regions with strict data protection regulations, such as Europe. References: 1: Privacy by Design - The LIFE Institute; 2: System Development Life Cycle - GeeksforGeeks; 3: [Privacy Impact Assessment (PIA) | NZ Digital government]; 4: [Privacy Notices under EU Data Protection Law | Privacy International]

NEW QUESTION # 217

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

Answer: B

NEW QUESTION # 218

SCENARIO

Please use the following to answer the next QUESTION:

Edufox has hosted an annual convention of users of its famous e-learning software platform, and over time, it has become a grand event. It fills one of the large downtown conference hotels and overflows into the others, with several thousand attendees enjoying three days of presentations, panel discussions and networking. The convention is the centerpiece of the company's product rollout schedule and a great training opportunity for current users. The sales force also encourages prospective clients to attend to get a better sense of the ways in which the system can be customized to meet diverse needs and understand that when they buy into this system, they are joining a community that feels like family.

This year's conference is only three weeks away, and you have just heard news of a new initiative supporting it: a smartphone app for attendees. The app will support late registration, highlight the featured presentations and provide a mobile version of the conference program. It also links to a restaurant reservation system with the best cuisine in the areas featured. "It's going to be great," the developer, Deidre Hoffman, tells you, "if that is, we actually get it working!" She laughs nervously but explains that because of the tight time frame she'd been given to build the app, she outsourced the job to a local firm. "It's just three young people," she says, "but they do great work." She describes some of the other apps they have built. When asked how they were selected for this job, Deidre shrugs. "They do good work, so I chose them." Deidre is a terrific employee with a strong track record. That's why she's been charged to deliver this rushed project. You're sure she has the best interests of the company at heart, and you don't doubt that she's under pressure to meet a deadline that cannot be pushed back. However, you have concerns about the app's handling of personal data and its security safeguards. Over lunch in the break room, you start to talk to her about it, but she quickly tries to reassure you, "I'm sure with your help we can fix any security issues if we have to, but I doubt there'll be any. These people build apps for a living, and they know what they're doing. You worry too much, but that's why you're so good at your job!" Which is the best first step in understanding the data security practices of a potential vendor?

- A. Conducting a physical audit of the vendor's facilities.
- B. Conducting a penetration test of the vendor's data security structure.
- **C. Requiring the vendor to complete a questionnaire assessing International Organization for Standardization (ISO) 27001 compliance.**
- D. Examining investigation records of any breaches the vendor has experienced.

Answer: C

Explanation:

This answer is the best first step in understanding the data security practices of a potential vendor, as it can provide a quick and easy way to evaluate the vendor's alignment with a widely recognized and respected standard for information security management systems (ISMS). Requiring the vendor to complete a questionnaire assessing ISO 27001 compliance can help you to obtain relevant and consistent information about the vendor's data security policies, objectives, risks, controls, processes and performance. The questionnaire can also help you to compare different vendors based on their level of compliance and identify any areas that need further clarification or verification. Reference: IAPP CIPM Study Guide, page 82; ISO/IEC 27002:2013, section 15.1.2

NEW QUESTION # 219

SCENARIO

Please use the following to answer the next QUESTION:

Richard McAdams recently graduated law school and decided to return to the small town of Lexington, Virginia to help run his aging grandfather's law practice. The elder McAdams desired a limited, lighter role in the practice, with the hope that his grandson would eventually take over when he fully retires. In addition to hiring Richard, Mr. McAdams employs two paralegals, an administrative assistant, and a part-time IT specialist who handles all of their basic networking needs. He plans to hire more employees once Richard gets settled and assesses the office's strategies for growth.

Immediately upon arrival, Richard was amazed at the amount of work that needed to be done in order to modernize the office, mostly in regard to the handling of clients' personal data. His first goal is to digitize all the records kept in file cabinets, as many of the documents contain personally identifiable financial and medical data. Also, Richard has noticed the massive amount of copying by the administrative assistant throughout the day, a practice that not only adds daily to the number of files in the file cabinets, but may create security issues unless a formal policy is firmly in place. Richard is also concerned with the overuse of the communal copier/printer located in plain view of clients who frequent the building. Yet another area of concern is the use of the same fax machine by all of the employees. Richard hopes to reduce its use dramatically in order to ensure that personal data receives the utmost security and protection, and eventually move toward a strict Internet faxing policy by the year's end.

Richard expressed his concerns to his grandfather, who agreed, that updating data storage, data security, and an overall approach to increasing the protection of personal data in all facets is necessary. Mr. McAdams granted him the freedom and authority to do so. Now Richard is not only beginning a career as an attorney, but also functioning as the privacy officer of the small firm. Richard plans to meet with the IT employee the following day, to get insight into how the office computer system is currently set-up and managed. Richard believes that a transition from the use of fax machine to Internet faxing provides all of the following security benefits EXCEPT?

- A. The ability to store faxes electronically, either on the user's PC or a password-protected network server.
- B. The ability to encrypt the transmitted faxes through a secure server.
- C. Reduction of the risk of data being seen or copied by unauthorized personnel.
- D. Greater accessibility to the faxes at an off-site location.

Answer: D

Explanation:

A transition from the use of fax machine to Internet faxing does not provide the security benefit of greater accessibility to the faxes at an off-site location. This is because Internet faxing requires a secure internet connection and a compatible device to access the faxes online. If the user is at an off-site location that does not have these requirements, they may not be able to access their faxes.

Furthermore, greater accessibility may not necessarily be a security benefit, as it may also increase the risk of unauthorized access or interception by third parties. Therefore, this option is not a security benefit of Internet faxing.

The other options are security benefits of Internet faxing. The ability to encrypt the transmitted faxes through a secure server ensures that the faxes are protected from eavesdropping or tampering during transmission. The reduction of the risk of data being seen or copied by unauthorized personnel eliminates the need for physical security measures such as locks or shredders for fax machines and paper documents. The ability to store faxes electronically, either on the user's PC or a password-protected network server, allows for better control and management of the faxes and reduces the storage space and costs associated with paper documents.

Reference: 1: Is Online Fax Secure in 2023? All You Need to Know!; 2: Is faxing secure: How to fax from a computer safely - PandaDoc

NEW QUESTION # 220

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