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## IAPP Certified Information Privacy Manager (CIPM) CIPM Prüfungsfragen mit Lösungen (Q112-Q117):

### 112. Frage

Which is the best way to view an organization's privacy framework?

- A. As an industry benchmark that can apply to many organizations
- B. As an aspirational goal that improves the organization
- C. As a living structure that aligns to changes in the organization
- D. As a fixed structure that directs changes in the organization

Antwort: C

Begründung:

Explanation

The best way to view an organization's privacy framework is as a living structure that aligns to changes in the organization, such as business goals, stakeholder expectations, legal requirements, and technological developments. A privacy framework should be flexible and adaptable to support the organization's privacy strategy and vision. It should also be compatible with other frameworks, such as the cybersecurity framework, that the organization may use. References: IAPP CIPM Study Guide, page 16.

### 113. Frage

Which of the following is NOT a main technical data control area?

- A. Access controls.
- B. Tokenization.
- C. Data minimization.
- D. Obfuscation.

Antwort: D

Begründung:

Obfuscation is not a main technical data control area. Obfuscation means hiding or disguising data or information to make it less intelligible or accessible. Obfuscation can be used as a security measure or a privacy-enhancing technique, but it is not a specific type of data control. The main technical data control areas are tokenization, encryption, access controls, and data minimization. Tokenization means replacing sensitive data with non-sensitive substitutes called tokens that have no intrinsic value. Encryption means transforming data into an unreadable format that can only be decrypted with a key. Access controls mean restricting who can access or modify data based on their roles, permissions, or authentication methods. Data minimization means collecting, storing, and processing only the minimum amount of data necessary for a specific purpose<sup>1, 2</sup>. References: CIPM - International Association of Privacy Professionals, Free CIPM Study Guide  
- International Association of Privacy Professionals

### 114. Frage

Which is the best way to view an organization's privacy framework?

- A. As an industry benchmark that can apply to many organizations
- B. As an aspirational goal that improves the organization
- C. As a fixed structure that directs changes in the organization
- D. As a living structure that aligns to changes in the organization

Antwort: C

### 115. Frage

All of the following are components of a data collection notice EXCEPT?

- A. The lawful interests pursued by the responsible party collecting the information.
- B. The categories of information shared with third parties
- C. The length of time the personal information will be stored.
- D. The meta-data which could be generated from collection of the information.

Antwort: D

### 116. Frage

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 information will be LEAST crucial from a privacy perspective in Penny's review of vendor contracts?

- A. The data a vendor will have access to
- B. Audit rights
- C. Liability for a data breach
- D. Pricing for data security protections

**Antwort: D**

Begründung:

The information that will be least crucial from a privacy perspective in Penny's review of vendor contracts is the pricing for data security protections. This is because the pricing for data security protections is a business decision that does not directly affect the privacy rights and obligations of Ace Space and its customers. The pricing for data security protections may be relevant for budgeting and negotiating purposes, but it does not determine the level or adequacy of data security measures that the vendor must provide to protect personal data.

The other options are more crucial from a privacy perspective in Penny's review of vendor contracts. Audit rights (A) are important to ensure that Ace Space can monitor and verify the vendor's compliance with the contract terms and the applicable privacy laws and regulations. Audit rights allow Ace Space to access the vendor's records, systems, policies and procedures related to personal data processing and to conduct inspections or assessments as needed. Liability for a data breach (B) is important to allocate the responsibility and consequences of a data breach involving personal data that the vendor processes on behalf of Ace Space. Liability for a data breach may include indemnification, compensation, notification, remediation and termination clauses that protect Ace Space's interests and obligations in the event of a data breach. The data a vendor will have access to (D) is important to define the scope, purpose, duration and conditions of the personal data processing that the vendor will perform for Ace Space. The data a vendor will have access to may include the categories, types, sources, recipients and retention periods of personal data that the vendor will collect, store, use or share on behalf of Ace Space.

Reference:

CIPM Body of Knowledge Domain II: Privacy Program Operational Life Cycle - Task 3: Implement privacy program components - Subtask 3: Establish third-party processor management program CIPM Study Guide - Chapter 4: Privacy Program Operational Life Cycle - Section 4.3: Third-Party Processor Management

## 117. Frage

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