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>> CIPM参考書内容 <<

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IAPP Certified Information Privacy Manager (CIPM) 認定 CIPM 試験問題 (Q203-Q208):

質問 # 203

SCENARIO

Please use the following to answer the next question:

You are the privacy manager within the privacy office of a National Forest Parks and Recreation Department.

While having lunch with a colleague from the IT division, you learn that the IT director has put out a request for proposal (RFP) which calls for a system that collects the personal data of park attendees.

You consult with a few other colleagues in IT and learn that the RFP is worded such that it leaves it to the vendors to demonstrate what information they would collect from people who enter parks anywhere in the country, either in a vehicle or on foot. A partial list of the information collected includes:

* personal identifiers such as name, address, age, gender;

* vehicle registration information;

* facial images of park attendees;

* health information (e.g., physical disabilities, use of mobility devices) The stated purpose of the RFP is to:

"Improve the National Forest, Parks, and Recreation Department's ability to track and monitor service usage thereby increasing the robustness of our customer data and to improve service offerings." Companies have already started submitting proposals for software solutions that address these information gathering practices. There is only one week left before the RFP closes.

The IT department has put together an RFP evaluation team but no one from the privacy office has been a part of the RFP up to this point. This occurred despite the fact...

From a privacy management perspective, what is problematic about the "stated purpose" of the RFP?

- A. It could lead to unauthorized collection of personal data to improve customer service.
- B. It seeks to improve the robustness of customer data.
- C. It seeks to track and monitor service usage by the customers.
- **D. It does not specify what information will be collected for improving customer data.**

正解: D

質問 # 204

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, 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.

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

正解: A

質問 # 205

SCENARIO

Please use the following to answer the next question:

Paul Daniels, with years of experience as a CEO, is worried about his son Carlton's successful venture, Gadgo.

A technological innovator in the communication industry that quickly became profitable, Gadgo has moved beyond its startup phase. While it has retained its vibrant energy, Paul fears that under Carlton's direction, the company may not be taking its risks or obligations as seriously as it needs to. Paul has hired you, a privacy Consultant, to assess the company and report to both father and son. "Carlton won't listen to me," Paul says, "but he may pay attention to an expert." Gadgo's workplace is a clubhouse for innovation, with games, toys, snacks, espresso machines, giant fish tanks and even an iguana who regards you with little interest. Carlton, too, seems bored as he describes to you the company's procedures and technologies for data protection. It's a loose assemblage of controls, lacking consistency and with plenty of weaknesses. "This is a technology company," Carlton says. "We create. We innovate. I don't want unnecessary measures that will only slow people down and clutter their thoughts." The meeting lasts until early evening. Upon leaving, you walk through the office. It looks as if a strong windstorm has recently blown through, with papers scattered across desks and tables and even the floor. A

"cleaning crew" of one teenager is emptying the trash bins. A few computers have been left on for the night; others are missing. Carlton takes note of your attention to this: "Most of my people take their laptops home with them, or use their own tablets or phones. I want them to use whatever helps them to think and be ready day or night for that great insight. It may only come once!" What phase in the Privacy Maturity Model (PMM) does Gadgo's privacy program best exhibit?

- A. Defined
- B. Managed
- C. Ad hoc
- D. Repeatable

正解: C

質問 # 206

There are different forms of monitoring available for organizations to consider when aligning with their privacy program goals. Which of the following forms of monitoring is best described as 'auditing'?

- A. Ensuring third parties have appropriate security and privacy requirements in place.
- B. Evaluating operations, systems, and processes.
- C. Tracking, reporting and documenting complaints from all sources.
- D. Assisting in the completion of attesting reporting for SOC2, ISO, or BS7799.

正解: B

解説:

Evaluating operations, systems, and processes is best described as 'auditing', as it involves conducting a systematic and independent examination of the organization's privacy practices and controls to verify their effectiveness and compliance. The other options are more related to other forms of monitoring, such as complaint handling, reporting, and third-party oversight. Reference: CIPM Body of Knowledge, Domain III: Privacy Program Management Activities, Task 5: Monitor privacy program performance.

質問 # 207

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!"

What safeguard can most efficiently ensure that privacy protection is a dimension of relationships with vendors?

- A. Do business only with vendors who are members of privacy trade associations.
- **B. Include appropriate language about privacy protection in vendor contracts.**
- C. Require that a person trained in privacy protection be part of all vendor selection teams.
- D. Perform a privacy audit on any vendor under consideration.

正解: B

解説:

This answer is the best way to ensure that privacy protection is a dimension of relationships with vendors, as it can establish clear and binding terms and conditions for both parties regarding their roles and responsibilities for data processing activities. Including appropriate language about privacy protection in vendor contracts can help to define the scope, purpose, duration and type of data processing, as well as the rights and obligations of both parties. The contracts can also specify the technical and organizational measures that the vendor must implement to protect the data from unauthorized or unlawful access, use, disclosure, alteration or destruction, and to notify the organization of any security incidents or breaches. The contracts can also allow the organization to monitor, audit or inspect the vendor's performance and compliance with the contract terms and applicable laws and regulations.

References: IAPP CIPM Study Guide, page 82; ISO/IEC

27002:2013, section 15.1.2

質問 # 208

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