

# CIPM Exam Question | CIPM Pass Guarantee



## CIPM FINAL EXAM QUESTIONS AND ANSWERS 2023-2025

Proactive privacy management is accomplished through three tasks - 1) Define your organization's privacy vision and privacy mission statements 2) Develop privacy strategy 3) Structure your privacy team

This is needed to structure responsibilities with business goals - Strategic Management

Identifies alignment to organizational vision and defines the privacy leaders for an organization, along with the resources necessary to execute the vision. - Strategic Management model

Member of the privacy team who may be responsible for privacy program framework development, management and reporting within an organization - Privacy professional

Strategic management of privacy starts by - creating or updating the company's vision and mission statement based on privacy best practice

Privacy best practices - 1) Develop vision and mission statement objectives 2) define privacy program scope 3) identify legal and regulatory compliance challenges 4) identify organization personal information legal requirements

This key factor that lays the groundwork for the rest of the privacy program elements and is typically comprised of a short sentence or two that describe the purpose and ideas in less than 30 seconds. - Vision or mission statement

This explains what you do as an organization, not who you are; what the organization stands for and why what you do as an organization to protect personal information is done - Mission Statement

What are the steps in the five step metric cycle - Identify, Define, Select, Collect, Analyze

The first step in the selecting the correct metrics starts by what? - Identifying the intended metric audience

The primary audience for metrics may include - Legal and privacy officers, senior leadership; CIO, CSO, PM, Information Systems Owner (ISO), Information Security Officer (ISO). Others considered users and managers

The secondary audience includes those who may not have privacy as a primary task include - CFO, Training organizations, HR, IG, HIPAA security officials

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## IAPP Certified Information Privacy Manager (CIPM) Sample Questions

## (Q61-Q66):

### NEW QUESTION # 61

#### SCENARIO

Please use the following to answer the next question:

For 15 years, Albert has worked at Treasure Box - a mail order company in the United States (U.S.) that used to sell decorative candles around the world, but has recently decided to limit its shipments to customers in the 48 contiguous states. Despite his years of experience, Albert is often overlooked for managerial positions. His frustration about not being promoted, coupled with his recent interest in issues of privacy protection, have motivated Albert to be an agent of positive change.

He will soon interview for a newly advertised position, and during the interview, Albert plans on making executives aware of lapses in the company's privacy program. He feels certain he will be rewarded with a promotion for preventing negative consequences resulting from the company's outdated policies and procedures.

For example, Albert has learned about the AICPA (American Institute of Certified Public Accountants)/CICA (Canadian Institute of Chartered Accountants) Privacy Maturity Model (PMM). Albert thinks the model is a useful way to measure Treasure Box's ability to protect personal data. Albert has noticed that Treasure Box fails to meet the requirements of the highest level of maturity of this model; at his interview, Albert will pledge to assist the company with meeting this level in order to provide customers with the most rigorous security available.

Albert does want to show a positive outlook during his interview. He intends to praise the company's commitment to the security of customer and employee personal data against external threats. However, Albert worries about the high turnover rate within the company, particularly in the area of direct phone marketing. He sees many unfamiliar faces every day who are hired to do the marketing, and he often hears complaints in the lunch room regarding long hours and low pay, as well as what seems to be flagrant disregard for company procedures.

In addition, Treasure Box has had two recent security incidents. The company has responded to the incidents with internal audits and updates to security safeguards. However, profits still seem to be affected and anecdotal evidence indicates that many people still harbor mistrust. Albert wants to help the company recover.

He knows there is at least one incident the public is unaware of, although Albert does not know the details. He believes the company's insistence on keeping the incident a secret could be a further detriment to its reputation. One further way that Albert wants to help Treasure Box regain its stature is by creating a toll-free number for customers, as well as a more efficient procedure for responding to customer concerns by postal mail.

In addition to his suggestions for improvement, Albert believes that his knowledge of the company's recent business maneuvers will also impress the interviewers. For example, Albert is aware of the company's intention to acquire a medical supply company in the coming weeks.

With his forward thinking, Albert hopes to convince the managers who will be interviewing him that he is right for the job.

What is one important factor that Albert fails to consider regarding Treasure Box's response to their recent security incident?

- A. How data at the company is collected
- B. What the nature of the data is
- C. How long data at the company is kept
- D. Who has access to the data

**Answer: C**

### NEW QUESTION # 62

#### SCENARIO

Please use the following to answer the next QUESTION:

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customer and employee personal data against external threats. However, Albert worries about the high turnover rate within the company, particularly in the area of direct phone marketing. He sees many unfamiliar faces every day who are hired to do the marketing, and he often hears complaints in the lunch room regarding long hours and low pay, as well as what seems to be flagrant disregard for company procedures.

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With his forward thinking, Albert hopes to convince the managers who will be interviewing him that he is right for the job.

In consideration of the company's new initiatives, which of the following laws and regulations would be most appropriate for Albert to mention at the interview as a priority concern for the privacy team?

- A. The Telephone Consumer Protection Act (TCPA)
- **B. The General Data Protection Regulation (GDPR)**
- C. Gramm-Leach-Bliley Act (GLBA)
- D. Health Insurance Portability and Accountability Act (HIPAA)

**Answer: B**

#### NEW QUESTION # 63

A minimum requirement for carrying out a Data Protection Impact Assessment (DPIA) would include?

- A. Monitoring of a publicly accessible area on a large scale.
- **B. Processing on a large scale of special categories of data.**
- C. Assessment of security measures.
- D. Assessment of the necessity and proportionality.

**Answer: B**

Explanation:

Explanation

Processing on a large scale of special categories of data is a minimum requirement for carrying out a Data Protection Impact Assessment (DPIA) under the General Data Protection Regulation (GDPR). A DPIA is a type of Privacy Impact Assessment (PIA) that is specifically required by the GDPR when a processing activity is likely to result in a high risk to the rights and freedoms of natural persons. According to Article 35(3)(b) of the GDPR, a DPIA is mandatory when the processing involves a large scale of special categories of data or personal data relating to criminal convictions and offences. Special categories of data are personal data that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data, sex life or sexual orientation. These types of data are considered more sensitive and require more protection, as they may pose higher risks of discrimination, identity theft, fraud, or other harms to the data subjects.

References:

\* CIPM Body of Knowledge (2021), Domain IV: Privacy Program Operational Life Cycle, Section C: Monitoring and Managing Program Performance Subsection 1: Privacy Impact Assessments

\* CIPM Study Guide (2021), Chapter 9: Monitoring and Managing Program Performance Section 9.1: Privacy Impact Assessments

\* CIPM Textbook (2019), Chapter 9: Monitoring and Managing Program Performance Section 9.1: Privacy Impact Assessments

\* CIPM Practice Exam (2021), Question 147

\* GDPR Article 35(3)(b) and Article 9

#### NEW QUESTION # 64

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 Question about the product from the distributor. Sanjay needed to look more closely at the product in order to be able to answer the Question 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 administrative safeguards should be implemented to protect the collected data while in use by Manasa and her product management team?

- A. Conduct a privacy impact assessment (PIA) to evaluate the risks involved
- **B. Document the data flows for the collected data**
- C. Limit data transfers to the US by keeping data collected in Europe within a local data center
- D. Implement a policy restricting data access on a "need to know" basis

**Answer: B**

#### **NEW QUESTION # 65**

Under the General Data Protection Regulation (GDPR), which situation would be LEAST likely to require a Data Protection Impact Assessment (DPIA)?

- A. The use of a camera system to monitor driving behavior on highways
- B. A Human Resources department using a tool to monitor its employees' internet activity
- **C. An online magazine using a mailing list to send a generic daily digest to marketing emails**
- D. A health clinic processing its patients' genetic and health data

**Answer: C**

Explanation:

A Data Protection Impact Assessment (DPIA) is a process to help identify and minimize the data protection risks of a project.

Under the GDPR, a DPIA is required when the processing is likely to result in a high risk to the rights and freedoms of individuals, especially when using new technologies. The GDPR provides some examples of high-risk processing activities, such as systematic and extensive evaluation of personal aspects, large-scale processing of special categories of data, or systematic monitoring of public areas. The other options are more likely to require a DPIA than the online magazine using a mailing list to send a generic daily digest to marketing emails, as they involve more sensitive or intrusive types of processing. Reference:

[Data protection impact assessments | ICO]

[Art. 35 GDPR - Data protection impact assessment - GDPR.eu]

#### **NEW QUESTION # 66**

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