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Certified Information Privacy Manager (CIPM) Exam Dump

QUESTION NO: 1

SCENARIO

Please use the following to answer the next question:

Henry Home Furnishings has built high-end furniture for nearly forty years. However, the new owner, Anton, has found some degree of disorganization after touring the company headquarters. His uncle Henry had always focused on production – not data processing – and Anton is concerned. In several storage rooms, he has found paper files, disks, and old computers that appear to contain the personal data of current and former employees and customers. Anton knows that a single break-in could irrevocably damage the company's relationship with its loyal customers. He intends to set a goal of guaranteed zero loss of personal information.

To this end, Anton originally planned to place restrictions on who was admitted to the physical premises of the company. However, Kenneth – his uncle's vice president and longtime confidante – wants to hold off on Anton's idea in favor of converting any paper records held at the company to electronic storage. Kenneth believes this process would only take one or two years. Anton likes this idea; he envisions a password-protected system that only he and Kenneth can access.

Anton also plans to divest the company of most of its subsidiaries. Not only will this make his job easier, but it will simplify the management of the stored data. The heads of subsidiaries like the art gallery and kitchenware store down the street will be responsible for their own information management. Then, any unneeded subsidiary data still in Anton's possession can be destroyed within the next few years. After learning of a recent security incident, Anton realizes that another crucial step will be notifying

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subjected to harsh tests of market, they are highly the manifestation of responsibility carrying out the tenets of customer oriented

IAPP Certified Information Privacy Manager (CIPM) Sample Questions (Q93-Q98):

NEW QUESTION # 93
SCENARIO
Please use the following to answer the next QUESTION:
Amira is thrilled about the sudden expansion of NatGen. As the joint Chief Executive Officer (CEO) with her long-time business partner Sadie, Amira has watched the company grow into a major competitor in the green energy market. The current line of products includes wind turbines, solar energy panels, and equipment for geothermal systems. A talented team of developers means that NatGen's line of products will only continue to grow.

With the expansion, Amira and Sadie have received advice from new senior staff members brought on to help manage the company's growth. One recent suggestion has been to combine the legal and security functions of the company to ensure observance of privacy laws and the company's own privacy policy. This sounds overly complicated to Amira, who wants departments to be able to use, collect, store, and dispose of customer data in ways that will best suit their needs. She does not want administrative oversight and complex structuring to get in the way of people doing innovative work.

Sadie has a similar outlook. The new Chief Information Officer (CIO) has proposed what Sadie believes is an unnecessarily long timetable for designing a new privacy program. She has assured him that NatGen will use the best possible equipment for electronic storage of customer and employee data. She simply needs a list of equipment and an estimate of its cost. But the CIO insists that many issues are necessary to consider before the company gets to that stage.

Regardless, Sadie and Amira insist on giving employees space to do their jobs. Both CEOs want to entrust the monitoring of employee policy compliance to low-level managers. Amira and Sadie believe these managers can adjust the company privacy policy according to what works best for their particular departments.

NatGen's CEOs know that flexible interpretations of the privacy policy in the name of promoting green energy would be highly unlikely to raise any concerns with their customer base, as long as the data is always used in course of normal business activities.

Perhaps what has been most perplexing to Sadie and Amira has been the CIO's recommendation to institute a privacy compliance hotline. Sadie and Amira have relented on this point, but they hope to compromise by allowing employees to take turns handling reports of privacy policy violations. The implementation will be easy because the employees need no special preparation. They will simply have to document any concerns they hear.

Sadie and Amira are aware that it will be challenging to stay true to their principles and guard against corporate culture strangling creativity and employee morale. They hope that all senior staff will see the benefit of trying a unique approach.
What Data Lifecycle Management (DLM) principle should the company follow if they end up allowing departments to interpret the privacy policy differently?

- A. Prove the authenticity of the company's records.
- B. Adequately document reasons for inconsistencies.
- C. Arrange for official credentials for staff members.
- D. Create categories to reflect degrees of data importance.

Answer: B

Explanation:
If the company ends up allowing departments to interpret the privacy policy differently, they should follow the Data Lifecycle Management (DLM) principle of adequately documenting reasons for inconsistencies. This principle requires that data should be accurate, complete, and consistent throughout its lifecycle and that any deviations or discrepancies should be justified and recorded1 This would help the company to maintain data quality and integrity, as well as to demonstrate accountability and compliance with data protection regulations2 The other options are not DLM principles that the company should follow if they allow departments to interpret the privacy policy differently. Proving the authenticity of the company's records is a principle related to data preservation and archiving, not data interpretation3 Arranging for official credentials for staff members is a principle related to data access and security, not data interpretation4 Creating categories to reflect degrees of data importance is a principle related to data classification and retention, not data interpretation5 References: 1: Data Lifecycle Management: A Complete Guide | Splunk; 2: Data Lifecycle Management | IBM; 3: Data Preservation | Digital Preservation Handbook; 4: Data Access Management Best Practices | Smartsheet; 5: Data Classification: What It Is And How To Do It | Varonis

NEW QUESTION # 94
Which of the following best supports implementing controls to bring privacy policies into effect?

- A. The information technology (IT) group supporting and enhancing the privacy program and privacy policy by developing

processes and controls.
- B. The Chief Information Officer as part of the Senior Management Team creating enterprise privacy policies to ensure controls are available.
- C. The legal department or outside counsel conducting a thorough review of the privacy program and policies.
- D. The internal audit department establishing the audit controls which test for policy effectiveness.

Answer: D

NEW QUESTION # 95

Which is TRUE about the scope and authority of data protection oversight authorities?

- A. All authority in the European Union rests with the Data Protection Commission (DPC)
- B. The Office of the Privacy Commissioner (OPC) of Canada has the right to impose financial sanctions on violators
- C. The Asia-Pacific Economic Cooperation (APEC) Privacy Frameworks require all member nations to designate a national data protection authority
- D. No one agency officially oversees the enforcement of privacy regulations in the United States

Answer: B

NEW QUESTION # 96

Which of the following best supports implementing controls to bring privacy policies into effect?

- A. The internal audit department establishing the audit controls which test for policy effectiveness.
- B. The Chief Information Officer as part of the Senior Management Team creating enterprise privacy policies to ensure controls are available.
- C. The information technology (IT) group supporting and enhancing the privacy program and privacy policy by developing processes and controls.
- D. The legal department or outside counsel conducting a thorough review of the privacy program and policies.

Answer: C

Explanation:
The information technology (IT) group supporting and enhancing the privacy program and privacy policy by developing processes and controls best supports implementing controls to bring privacy policies into effect. Privacy policies are documents that define the organization's principles, commitments, and practices for collecting, using, disclosing, retaining, and protecting personal information. Privacy policies need to be translated into operational processes and controls that ensure compliance with the policy objectives and requirements. The IT group can support and enhance the privacy program and privacy policy by developing processes and controls such as: data classification, data inventory, data mapping, data minimization, consent management, access control, encryption, pseudonymization, anonymization, security safeguards, breach detection and response, data subject rights fulfillment, data retention and disposal, audit logging and monitoring, privacy by design and default, privacy impact assessments, privacy notices and statements, privacy training and awareness.
Reference:
CIPM Body of Knowledge (2021), Domain II: Privacy Program Framework, Section A: Privacy Program Framework Components Subsection 1: Privacy Policies CIPM Study Guide (2021), Chapter 4: Privacy Program Framework Components Section 4.1: Privacy Policies CIPM Textbook (2019), Chapter 4: Privacy Program Framework Components Section 4.1: Privacy Policies CIPM Practice Exam (2021), Question 148

NEW QUESTION # 97
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!" Since it is too late to restructure the contract with the vendor or prevent the app from being deployed, what is the best step for you to take next?

- A. Insist on an audit of the vendor's privacy procedures and safeguards.
- B. Ask the vendor for verifiable information about their privacy protections so weaknesses can be identified.
- C. Implement a more comprehensive suite of information security controls than the one used by the vendor.
- D. Develop security protocols for the vendor and mandate that they be deployed.

Answer: B

Explanation:
Explanation
This answer is the best step to take next, as it can help you to assess the current state of the vendor's privacy practices and determine if they meet the organization's standards and expectations, as well as the applicable laws and regulations. Asking the vendor for verifiable information about their privacy protections can include requesting documentation, evidence or demonstration of how they collect, use, store, protect, share and dispose of personal data, what policies and procedures they have in place, what technical and organizational measures they implement, what certifications or audits they have obtained or undergone, and how they handle any privacy incidents or breaches. Based on this information, you can identify any weaknesses or gaps in the vendor's privacy protections and recommend or require any improvements or corrections before the app is deployed. References: IAPP CIPM Study Guide, page 82; ISO/IEC 27002:2013, section 15.1.2

NEW QUESTION # 98
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