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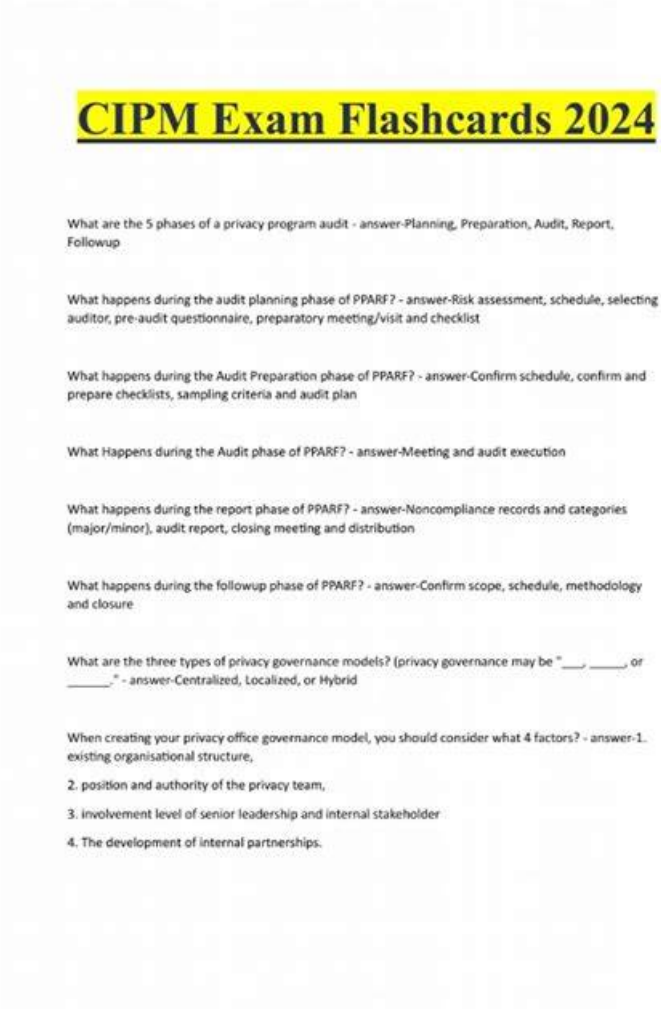
CIPM Exam Flashcards 2024

What are the 5 phases of a privacy program audit - answer-Planning, Preparation, Audit, Report, Followup

What happens during the audit planning phase of PPARF? - answer-Risk assessment, schedule, selecting auditor, pre-audit questionnaire, preparatory meeting/visit and checklist

What happens during the Audit Preparation phase of PPARF? - answer-Confirm schedule, confirm and prepare checklists, sampling criteria and audit plan

What Happens during the Audit phase of PPARF? - answer-Meeting and audit execution

What happens during the report phase of PPARF? - answer-Noncompliance records and categories (major/minor), audit report, closing meeting and distribution

What happens during the followup phase of PPARF? - answer-Confirm scope, schedule, methodology and closure

What are the three types of privacy governance models? (privacy governance may be "___, _____, or _____." - answer-Centralized, Localized, or Hybrid

When creating your privacy office governance model, you should consider what 4 factors? - answer-1. existing organisational structure,

2. position and authority of the privacy team,

3. involvement level of senior leadership and internal stakeholder

4. The development of internal partnerships.

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IAPP CIPM Exam Syllabus Topics:

Section	Weight	Objectives
Topic 1: Sustaining Program Performance	10–15%	- Performance metrics and KPIs - Change management - Continuous improvement - Monitoring, auditing and reporting
Topic 2: Assessing Data and Privacy Risks	17–22%	- Compliance gap analysis - Risk identification, analysis and mitigation - Privacy impact assessments (PIA/DPIA) - Data inventory and mapping

Topic 3: Responding to Requests and Incidents	14–18%	- Privacy incident response plan - Data subject rights management - Breach detection, notification and remediation - Regulatory interaction and reporting
Topic 4: Protecting Personal Data	12–18%	- Technical and organizational safeguards - Data lifecycle management - Privacy by design and default - Cross-border data transfers
Topic 5: Establishing Program Governance	17–22%	- Training and awareness programs - Accountability and oversight mechanisms - Stakeholder engagement and communication - Policies, procedures and standards
Topic 6: Developing a Privacy Program Framework	15–20%	- Legal and regulatory requirements - Privacy vision, strategy and objectives - Program governance structure and roles - Program scope and boundaries

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IAPP Certified Information Privacy Manager (CIPM) Sample Questions (Q87-Q92):

NEW QUESTION # 87
Which of the following is NOT a type of privacy program metric?

- A. Data enhancement metrics.
- B. Value creation metrics.
- C. Risk-reduction metrics.
- D. Business enablement metrics.

Answer: B

NEW QUESTION # 88
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?
What practice would afford the Director the most rigorous way to check on the program's compliance with laws, regulations and industry best practices?

- A. Auditing
- B. Assessment
- C. Monitoring
- D. Forensics

Answer: C

NEW QUESTION # 89
The theft of proprietary information could have best been prevented by?

- A. Doing criminal background checks on all contractors.
- B. Having requests for access reviewed by the privacy office.
- C. Escalating access requests for approval by the appropriate data custodian.
- D. Requiring multi-factor authentication for contractor access to confidential company data.

Answer: D

Explanation:
Comprehensive and Detailed Explanation:
The most effective way to prevent unauthorized access and data theft is requiring multi-factor authentication (MFA), which adds an extra layer of security beyond just passwords.
* Option A (Criminal background checks on all contractors) - Background checks help reduce risk but do not prevent credential misuse.
* Option B (Reviewing access requests by the privacy office) - The privacy office may advise on best practices but is not responsible for granting or enforcing access controls.
* Option C (Escalating access requests for approval by a data custodian) - While this improves oversight, it does not actively prevent credential misuse.
* Option D (Requiring MFA) is the best solution because it ensures that even if a password is compromised, an additional authentication factor is required, reducing unauthorized access risks.
Reference:CIPM Official Textbook, Module: Access Controls and Authentication - Section on Multi- Factor Authentication (MFA) and Least Privilege Principles.

NEW QUESTION # 90
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 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.
Which of the following policy statements needs additional instructions in order to further protect the personal data of their clients?

- A. When sending a print job containing personal data, the user must not leave the information visible on the computer screen following the print command and must retrieve the printed document immediately.
- B. All faxes sent from the office must be documented and the phone number used must be double checked to ensure a safe arrival.
- C. Before any copiers, printers, or fax machines are replaced or resold, the hard drives of these devices must be deleted before leaving the office.
- D. All unused copies, prints, and faxes must be discarded in a designated recycling bin located near the work station and emptied daily.

Answer: A

NEW QUESTION # 91
SCENARIO
Please use the following to answer the next QUESTION:
Natalia, CFO of the Nationwide Grill restaurant chain, had never seen her fellow executives so anxious. Last week, a data processing firm used by the company reported that its system may have been hacked, and customer data such as names, addresses, and birthdays may have been compromised. Although the attempt was proven unsuccessful, the scare has prompted several Nationwide Grill executives to Question the company's privacy program at today's meeting.
Alice, a vice president, said that the incident could have opened the door to lawsuits, potentially damaging Nationwide Grill's market position. The Chief Information Officer (CIO), Brendan, tried to assure her that even if there had been an actual breach, the chances of a successful suit against the company were slim. But Alice remained unconvinced.
Spencer - a former CEO and currently a senior advisor - said that he had always warned against the use of contractors for data processing. At the very least, he argued, they should be held contractually liable for telling customers about any security incidents. In his view, Nationwide Grill should not be forced to soil the company name for a problem it did not cause.
One of the business development (BD) executives, Haley, then spoke, imploring everyone to see reason.
"Breaches can happen, despite organizations' best efforts," she remarked. "Reasonable preparedness is key." She reminded everyone of the incident seven years ago when the large grocery chain Tinkerton's had its financial information compromised after a large order of Nationwide Grill frozen dinners. As a long-time BD executive with a solid understanding of Tinkerton's's corporate culture, built up through many years of cultivating relationships, Haley was able to successfully manage the company's incident response.
Spencer replied that acting with reason means allowing security to be handled by the security functions within the company - not BD staff. In a similar way, he said, Human Resources (HR) needs to do a better job training employees to prevent incidents. He pointed out that Nationwide Grill employees are overwhelmed with posters, emails, and memos from both HR and the ethics department related to the company's privacy program. Both the volume and the duplication of information means that it is often ignored altogether.
Spencer said, "The company needs to dedicate itself to its privacy program and set regular in-person trainings for all staff once a month." Alice responded that the suggestion, while well-meaning, is not practical. With many locations, local HR departments need to have flexibility with their training schedules. Silently, Natalia agreed.
What is the most realistic step the organization can take to help diminish liability in the event of another incident?

- A. Requiring the vendor to perform periodic internal audits.
- B. Keeping the majority of processing activities within the organization.
- C. Obtaining customer consent for any third-party processing of personal data.
- D. Specifying mandatory data protection practices in vendor contracts.

Answer: D

Explanation:
This answer is the most realistic step the organization can take to help diminish liability in the event of another incident, as it can ensure that the vendor complies with the same standards and obligations as the organization regarding data protection. Vendor contracts should include clauses that specify the scope, purpose, duration and type of data processing, as well as the rights and responsibilities of both parties. The contracts should also require the vendor to implement appropriate technical and organizational measures 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 should 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

NEW QUESTION # 92

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