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CIPM – IAPP EXAM 2024 WITH 100% CORRECT ANSWERS

Strategic Management is the first high level necessary task to implement proactive privacy management through the following 3 subtasks: - correct answer ✓✓ (1) Define Privacy Vision and Privacy Mission Statement\n\n(2) Develop Privacy Strategy\n\n(3) Structure Privacy Team

Strategic management of privacy starts by creating or updating the organization vision and mission statement based on privacy best practices that should include: - correct answer ✓✓ (1) Develop vision and mission statement objectives\n\n(2) Define privacy program scope\n\n(3) Identify legal and regulatory compliance challenges\n\n(4) Identify organization personal information legal requirements

Define Privacy Program Scope - correct answer ✓✓ (1) Identify & Understand Legal and Regulatory Compliance Challenges\n\n(2) Identify the Data Impacted\n\n(3) Understand Global Perspective\n\n(4) Customize Approach\n\n(5) Be Aware of Laws, Regulations, Processes, Procedures\n\n(6) Monitor Legal Compliance Factors

Types of Protection Models (4) - correct answer ✓✓ (1) Sectoral (US)\n\n(2) Comprehensive (EU, Canada, Russia)\n\n(3) Co-Regulatory (Australia)\n\n(4) Self Regulated (US, Japan, Singapore)

Questions to Ask When Determining Privacy Requirements (Legal) - correct answer ✓✓ (1) Who collects, uses, maintains Personal Information\n\n(2) What are the types of Personal Information\n\n(3) What are the legal requirements for the PI\n\n(4) Where is the PI stored\n\n(5) How is the PI collected\n\n(6) Why is the PI collected

Steps to Developing a Privacy Strategy (5) - correct answer ✓✓ (1) ID Stakeholders and Internal Partnerships\n\n(2) Leverage Key Functions\n\n(3) Create a Process for Interfacing\n\n(4) Develop a Data Governance Strategy\n\n(5) Conduct a Privacy Workshop

Data Governance Models (3) - correct answer ✓✓ (1) Centralized\n\n(2) Local/Decentralized\n\n(3) Hybrid

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IAPP Certified Information Privacy Manager (CIPM) Sample Questions (Q154-Q159):

NEW QUESTION # 154

SCENARIO

Please use the following to answer the next QUESTION:

John is the new privacy officer at the prestigious international law firm - A&M LLP. A&M LLP is very proud of its reputation in the practice areas of Trusts & Estates and Merger & Acquisition in both U.S. and Europe.

During lunch with a colleague from the Information Technology department, John heard that the Head of IT, Derrick, is about to outsource the firm's email continuity service to their existing email security vendor - MessageSafe. Being successful as an email hygiene vendor, MessageSafe is expanding its business by leasing cloud infrastructure from Cloud Inc. to host email continuity service for A&M LLP.

John is very concerned about this initiative. He recalled that MessageSafe was in the news six months ago due to a security breach. Immediately, John did a quick research of MessageSafe's previous breach and learned that the breach was caused by an unintentional mistake by an IT administrator. He scheduled a meeting with Derrick to address his concerns.

At the meeting, Derrick emphasized that email is the primary method for the firm's lawyers to communicate with clients, thus it is critical to have the email continuity service to avoid any possible email downtime.

Derrick has been using the anti-spam service provided by MessageSafe for five years and is very happy with the quality of service provided by MessageSafe. In addition to the significant discount offered by MessageSafe, Derrick emphasized that he can also speed up the onboarding process since the firm already has a service contract in place with MessageSafe. The existing on-premises email continuity solution is about to reach its end of life very soon and he doesn't have the time or resource to look for another solution.

Furthermore, the off-premises email continuity service will only be turned on when the email service at A&M LLP's primary and secondary data centers are both down, and the email messages stored at MessageSafe site for continuity service will be automatically deleted after 30 days.

Which of the following is NOT an obligation of MessageSafe as the email continuity service provider for A&M LLP?

- A. Security commitment.
- **B. Certifications to relevant frameworks.**
- C. Privacy compliance.
- D. Data breach notification to A&M LLP.

Answer: B

Explanation:

An obligation that is not applicable to MessageSafe as the email continuity service provider for A&M LLP is obtaining certifications to relevant frameworks. Certifications are voluntary mechanisms that enable data controllers or processors to demonstrate their compliance with the GDPR or other standards by obtaining a certification issued by an accredited certification body⁷ Certifications can provide benefits such as enhancing transparency, accountability, trust, and competitive advantage for data controllers or processors. However, they are not mandatory under the GDPR or other laws and do not reduce or eliminate the legal obligations or liabilities of data controllers or processors⁸ Therefore, MessageSafe is not obliged to obtain certifications to relevant frameworks as the email continuity service provider for A&M LLP. However, it may choose to do so if it wishes to showcase its compliance efforts or gain a competitive edge in the market. References: 7: Article

42 GDPR | General Data Protection Regulation (GDPR); 8: Guidelines 1/2018 on certification and identifying certification criteria in accordance with Articles 42 and 43 of the Regulation 2016/679 | European Data Protection Board

NEW QUESTION # 155

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.

To help Penny and her CEO with their objectives, what would be the most helpful approach to address her IT concerns?

- A. Undertake a tabletop exercise
- B. Roll out an encryption policy
- C. Ensure inventory of IT assets is maintained
- D. Host a town hall discussion for all IT employees

Answer: A

Explanation:

The most helpful approach to address Penny's IT concerns is to undertake a tabletop exercise. A tabletop exercise is a simulated scenario that tests the organization's ability to respond to a security incident, such as a data breach, a cyberattack, or a malware infection. A tabletop exercise typically involves:

A facilitator who guides the participants through the scenario and injects additional challenges or variables
A scenario that describes a plausible security incident based on real-world threats or past incidents
A set of objectives that define the expected outcomes and goals of the exercise
A set of questions that prompt the participants to discuss their roles, responsibilities, actions, decisions, and communications during the incident response process
A feedback mechanism that collects the participants' opinions and suggestions on how to improve the incident response plan and capabilities
A tabletop exercise can help Penny and her CEO with their objectives by:

Enhancing the awareness and skills of the IT team and other stakeholders involved in incident response
Identifying and addressing the gaps, weaknesses, and challenges in the incident response plan and process
Improving the coordination and collaboration among the IT team and other stakeholders during incident response
Evaluating and validating the effectiveness and efficiency of the incident response plan and process
Generating and implementing lessons learned and best practices for incident response

NEW QUESTION # 156

An executive for a multinational online retail company in the United States is looking for guidance in developing her company's privacy program beyond what is specifically required by law.

What would be the most effective resource for the executive to consult?

- A. Breach notifications from competitors.
- B. Industry frameworks.
- C. Oversight organizations.
- D. Internal auditors.

Answer: B

Explanation:

Industry frameworks are the most effective resource for an executive who wants to develop her company's privacy program beyond what is specifically required by law. Industry frameworks are collections of best practices, standards, and guidelines that help organizations establish and improve their privacy policies and procedures. Industry frameworks can help organizations demonstrate their commitment to privacy, enhance their reputation and trustworthiness, and comply with multiple privacy regulations. Some examples of industry frameworks are the NIST Privacy Framework², the ISO 27701 Privacy Information Management System³,

and the AICPA/CICA Generally Accepted Privacy Principles (GAPP)⁴. The other options are not as effective as industry frameworks for developing a privacy program. Internal auditors can help evaluate the effectiveness and compliance of existing privacy controls, but they may not provide guidance on how to improve or expand them. Oversight organizations can enforce privacy laws and regulations, but they may not offer advice on how to go beyond the legal requirements. Breach notifications from competitors can alert organizations to potential threats and vulnerabilities, but they may not suggest how to prevent or mitigate them. References: NIST Privacy Framework; ISO 27701 Privacy Information Management System; AICPA /CICA Generally Accepted Privacy Principles (GAPP)

NEW QUESTION # 157

(Which of the following should be your first step when conducting an internal privacy audit focused on identifying cross-border data transfers in cloud environments?)

- A. Review the list of the cloud providers and their location.
- **B. Review the data inventory.**
- C. Map the data and the locations where it is processed.
- D. Enable encryption of the data in transit by default.

Answer: B

Explanation:

The CIPM Operational Lifecycle requires that assessments begin with an understanding of what data exists and how it is classified. Reviewing the data inventory is the foundational step in any privacy audit because it establishes the scope of personal data, processing purposes, and system ownership. Without an accurate inventory, efforts to map cross-border transfers or identify processing locations will be incomplete or inaccurate.

While mapping data flows and locations (Option A) is critical, it must be informed by a validated inventory.

Encryption and cloud provider reviews are protective controls and vendor management activities that occur later in the lifecycle.

CIPM stresses that privacy audits should follow a structured approach: inventory # mapping # risk evaluation # controls. Starting with the data inventory ensures the audit is comprehensive, repeatable, and aligned with accountability obligations under global privacy laws.

NEW QUESTION # 158

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

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

Answer: C

NEW QUESTION # 159

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