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>> CIPM Valid Test Answers <<

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## **IAPP Certified Information Privacy Manager (CIPM) Sample Questions (Q129-Q134):**

### **NEW QUESTION # 129**

#### **SCENARIO**

Please use the following to answer the next question:

Your organization, the Chicago (U.S.)-based Society for Urban Greenspace, has used the same vendor to operate all aspects of an online store for several years. As a small nonprofit, the Society cannot afford the higher-priced options, but you have been relatively satisfied with this budget vendor, Shopping Cart Saver (SCS). Yes, there have been some issues. Twice, people who purchased items from the store have had their credit card information used fraudulently subsequent to transactions on your site, but in neither case did the investigation reveal with certainty that the Society's store had been hacked. The thefts could have been employee-related.

Just as disconcerting was an incident where the organization discovered that SCS had sold information it had collected from customers to third parties. However, as Jason Roland, your SCS account representative, points out, it took only a phone call from you to clarify expectations and the "misunderstanding" has not occurred again.

As an information-technology program manager with the Society, the role of the privacy professional is only one of many you play. In all matters, however, you must consider the financial bottom line. While these problems with privacy protection have been significant, the additional revenues of sales of items such as shirts and coffee cups from the store have been significant. The Society's operating budget is slim, and all sources of revenue are essential.

Now a new challenge has arisen. Jason called to say that starting in two weeks, the customer data from the store would now be stored on a data cloud. "The good news," he says, "is that we have found a low-cost provider in Finland, where the data would also be held. So, while there may be a small charge to pass through to you, it won't be exorbitant, especially considering the advantages of a cloud." Lately, you have been hearing about cloud computing and you know it's fast becoming the new paradigm for various applications. However, you have heard mixed reviews about the potential impacts on privacy protection. You begin to research and discover that a number of the leading cloud service providers have signed a letter of intent to work together on shared conventions and technologies for privacy protection. You make a note to find out if Jason's Finnish provider is signing on.

After conducting research, you discover a primary data protection issue with cloud computing. Which of the following should be your biggest concern?

- A. A lack of vendors in the cloud computing market
- B. An open programming model that results in easy access
- C. A reduced resilience of data structures that may lead to data loss.
- **D. An unwillingness of cloud providers to provide security information**

**Answer: D**

### **NEW QUESTION # 130**

Which of the following is NOT a type of privacy program metric?

- **A. Value creation metrics.**
- B. Commercial metrics.
- C. Business enablement metrics.
- D. Data enhancement metrics.

**Answer: A**

Explanation:

Types of privacy program metrics include business enablement metrics, data enhancement metrics, and commercial metrics. Business enablement metrics measure the effectiveness of the privacy program in enabling the business to function without compromising privacy. Data enhancement metrics measure the effectiveness of the privacy program in enhancing data protection, such as through data minimization, access controls, and data security. Commercial metrics measure the effectiveness of the privacy program in creating value, such as through the development of new products, services, and customer experiences.

Privacy program metrics are used to assess the effectiveness of a privacy program and measure its progress.

These metrics can include business enablement metrics, data enhancement metrics, and commercial metrics.

Value creation metrics, however, are not typically used as privacy program metrics.

### NEW QUESTION # 131

Incipia Corporation just trained the last of its 300 employees on their new privacy policies and procedures.

If Incipia wanted to analyze the effectiveness of the training over the next 6 months, which form of trend analysis should they use?

- A. Standard variance.
- **B. Statistical.**
- C. Cyclical.
- D. Irregular.

**Answer: B**

Explanation:

This answer is the best form of trend analysis that Incipia Corporation should use to analyze the effectiveness of the training over the next six months, as it can provide a quantitative and objective way to measure and compare the results and outcomes of the training against predefined criteria or indicators. Statistical trend analysis is a method that involves collecting, analyzing and presenting data using statistical tools and techniques, such as charts, graphs, tables or formulas. Statistical trend analysis can help to identify patterns, changes or correlations in the data over time, as well as to evaluate the performance and impact of the training on the organization's privacy program and objectives. References: IAPP CIPM Study Guide, page 901; ISO /IEC 27002:2013, section 18.1.3

### NEW QUESTION # 132

Your company provides a SaaS tool for B2B services and does not interact with individual consumers. A client's current employee reaches out with a right to delete request. What is the most appropriate response?

- A. Process the request assuming that the individual understands the implications to their organization if their information is deleted.
- B. Forward the request to the contact on file for the client asking them how they would like you to proceed.
- **C. Redirect the individual back to their employer to understand their rights and how this might impact access to company tools.**
- D. Explain you are unable to process the request because business contact information and associated data is not covered under privacy rights laws.

**Answer: C**

Explanation:

If your organization provides a SaaS tool for B2B services and does not interact with individual consumers, and a client's current employee reaches out with a right to delete request, the most appropriate response is to redirect the individual back to their employer to understand their rights and how this might impact access to company tools. This is because your organization is acting as a processor for the client, who is the controller of the employee's personal data. The controller is responsible for determining the purposes and means of processing personal data, as well as responding to data subject requests. The processor should only process personal data on behalf of and in accordance with the instructions of the controller. Therefore, you should not forward the request to the client, process the request without consulting the client, or deny the request based on business contact information being exempt from privacy rights laws<sup>1, 2</sup>. Reference: CIPM - International Association of Privacy Professionals, Free CIPM Study Guide - International Association of Privacy Professionals

### NEW QUESTION # 133

#### 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!" You see evidence that company employees routinely circumvent the privacy officer in developing new initiatives. How can you best draw attention to the scope of this problem?

- A. Insist upon one-on-one consultation with each person who works around the privacy officer.
- B. Hold discussions with the department head of anyone who fails to consult with the privacy officer.
- **C. Develop a metric showing the number of initiatives launched without consultation and include it in reports, presentations, and consultation.**
- D. Take your concerns straight to the Chief Executive Officer.

**Answer: C**

**Explanation:**

This answer is the best way to draw attention to the scope of this problem, as it can provide quantitative and objective evidence of how often the privacy officer is bypassed or ignored in the organization's data processing activities. Developing a metric showing the number of initiatives launched without consultation can help to measure and monitor the level of compliance and alignment with the organization's privacy program and policies, as well as the applicable laws and regulations. Including this metric in reports, presentations and consultation can help to communicate and raise awareness of this problem among the relevant stakeholders, such as senior management, project managers, developers or vendors. It can also help to demonstrate the value and importance of involving the privacy officer in the early stages of any initiative that involves personal data, as well as the potential consequences and risks of not doing so. References: IAPP CIPM Study Guide, page 891; ISO/IEC 27002:2013, section 18.1.3

## NEW QUESTION # 134

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