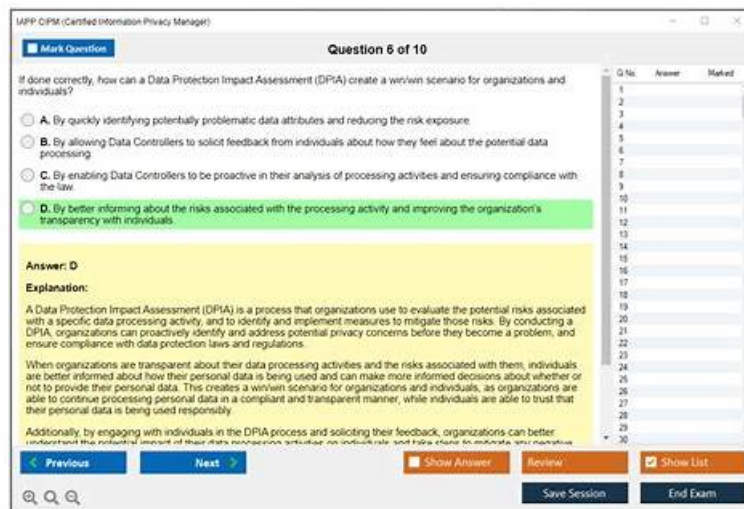


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IAPP Certified Information Privacy Manager (CIPM) Sample Questions (Q53-Q58):

NEW QUESTION # 53

Which of the following best demonstrates the effectiveness of a firm's privacy incident response process?

- A. The increase of privacy incidents reported by users
- **B. The decrease of mean time to resolve privacy incidents**
- C. The decrease of notifiable breaches
- D. The decrease of security breaches

Answer: B

Explanation:

The decrease of mean time to resolve privacy incidents best demonstrates the effectiveness of a firm's privacy incident response process. This metric measures how quickly and efficiently the firm can identify, contain, analyze, remediate, and report privacy

incidents. A lower mean time to resolve indicates a higher level of preparedness, responsiveness, and resilience in handling privacy incidents. References: IAPP CIPM Study Guide, page 25.

NEW QUESTION # 54

SCENARIO

Please use the following to answer the next QUESTION:

Martin Briseno is the director of human resources at the Canyon City location of the U.S. hotel chain Pacific Suites. In 1998, Briseno decided to change the hotel's on-the-job mentoring model to a standardized training program for employees who were progressing from line positions into supervisory positions. He developed a curriculum comprising a series of lessons, scenarios, and assessments, which was delivered in-person to small groups. Interest in the training increased, leading Briseno to work with corporate HR specialists and software engineers to offer the program in an online format. The online program saved the cost of a trainer and allowed participants to work through the material at their own pace.

Upon hearing about the success of Briseno's program, Pacific Suites corporate Vice President Maryanne Silva-Hayes expanded the training and offered it company-wide. Employees who completed the program received certification as a Pacific Suites Hospitality Supervisor. By 2001, the program had grown to provide industry-wide training. Personnel at hotels across the country could sign up and pay to take the course online. As the program became increasingly profitable, Pacific Suites developed an offshoot business, Pacific Hospitality Training (PHT). The sole focus of PHT was developing and marketing a variety of online courses and course progressions providing a number of professional certifications in the hospitality industry.

By setting up a user account with PHT, course participants could access an information library, sign up for courses, and take end-of-course certification tests. When a user opened a new account, all information was saved by default, including the user's name, date of birth, contact information, credit card information, employer, and job title. The registration page offered an opt-out choice that users could click to not have their credit card numbers saved. Once a user name and password were established, users could return to check their course status, review and reprint their certifications, and sign up and pay for new courses. Between 2002 and 2008, PHT issued more than 700,000 professional certifications.

PHT's profits declined in 2009 and 2010, the victim of industry downsizing and increased competition from e-learning providers. By 2011, Pacific Suites was out of the online certification business and PHT was dissolved. The training program's systems and records remained in Pacific Suites' digital archives, un-accessed and unused. Briseno and Silva-Hayes moved on to work for other companies, and there was no plan for handling the archived data after the program ended. After PHT was dissolved, Pacific Suites executives turned their attention to crucial day-to-day operations. They planned to deal with the PHT materials once resources allowed.

In 2012, the Pacific Suites computer network was hacked. Malware installed on the online reservation system exposed the credit card information of hundreds of hotel guests. While targeting the financial data on the reservation site, hackers also discovered the archived training course data and registration accounts of Pacific Hospitality Training's customers. The result of the hack was the exfiltration of the credit card numbers of recent hotel guests and the exfiltration of the PHT database with all its contents.

A Pacific Suites systems analyst discovered the information security breach in a routine scan of activity reports. Pacific Suites quickly notified credit card companies and recent hotel guests of the breach, attempting to prevent serious harm. Technical security engineers faced a challenge in dealing with the PHT data.

PHT course administrators and the IT engineers did not have a system for tracking, cataloging, and storing information. Pacific Suites has procedures in place for data access and storage, but those procedures were not implemented when PHT was formed. When the PHT database was acquired by Pacific Suites, it had no owner or oversight. By the time technical security engineers determined what private information was compromised, at least 8,000 credit card holders were potential victims of fraudulent activity.

What key mistake set the company up to be vulnerable to a security breach?

- A. Neglecting to make a backup copy of archived electronic files
- B. Collecting too much information and keeping it for too long
- C. Failing to outsource training and data management to professionals
- **D. Overlooking the need to organize and categorize data**

Answer: D

NEW QUESTION # 55

When devising effective employee policies to address a particular issue, which of the following should be included in the first draft?

- A. Roles and responsibilities of the different groups of individuals.
- B. Explanation of how the policy is applied within the organization.
- C. Rationale for the policy.
- **D. Points of contact for the employee.**

Answer: D

NEW QUESTION # 56

Formosa International operates in 20 different countries including the United States and France. What organizational approach would make complying with a number of different regulations easier?

- A. Data mapping.
- **B. Rationalizing requirements.**
- C. Fair Information Practices.
- D. Decentralized privacy management.

Answer: B

Explanation:

Explanation

Rationalizing requirements is an organizational approach that involves identifying and harmonizing the common elements of different privacy regulations and standards. This can make compliance easier and more efficient, as well as reduce the risk of conflicts or gaps in privacy protection. Rationalizing requirements can also help to create a consistent privacy policy and culture across different jurisdictions and business units. References: CIPM Study Guide, page 23.

NEW QUESTION # 57

SCENARIO

Please use the following to answer the next QUESTION:

You lead the privacy office for a company that handles information from individuals living in several countries throughout Europe and the Americas. You begin that morning's privacy review when a contracts officer sends you a message asking for a phone call. The message lacks clarity and detail, but you presume that data was lost.

When you contact the contracts officer, he tells you that he received a letter in the mail from a vendor stating that the vendor improperly shared information about your customers. He called the vendor and confirmed that your company recently surveyed exactly 2000 individuals about their most recent healthcare experience and sent those surveys to the vendor to transcribe it into a database, but the vendor forgot to encrypt the database as promised in the contract. As a result, the vendor has lost control of the data.

The vendor is extremely apologetic and offers to take responsibility for sending out the notifications. They tell you they set aside 2000 stamped postcards because that should reduce the time it takes to get the notice in the mail. One side is limited to their logo, but the other side is blank and they will accept whatever you want to write. You put their offer on hold and begin to develop the text around the space constraints. You are content to let the vendor's logo be associated with the notification.

The notification explains that your company recently hired a vendor to store information about their most recent experience at St. Sebastian Hospital's Clinic for Infectious Diseases. The vendor did not encrypt the information and no longer has control of it. All 2000 affected individuals are invited to sign-up for email notifications about their information. They simply need to go to your company's website and watch a quick advertisement, then provide their name, email address, and month and year of birth.

You email the incident-response council for their buy-in before 9 a.m. If anything goes wrong in this situation, you want to diffuse the blame across your colleagues. Over the next eight hours, everyone emails their comments back and forth. The consultant who leads the incident-response team notes that it is his first day with the company, but he has been in other industries for 45 years and will do his best. One of the three lawyers on the council causes the conversation to veer off course, but it eventually gets back on track. At the end of the day, they vote to proceed with the notification you wrote and use the vendor's postcards.

Shortly after the vendor mails the postcards, you learn the data was on a server that was stolen, and make the decision to have your company offer credit monitoring services. A quick internet search finds a credit monitoring company with a convincing name: Credit Under Lock and Key (CRUDLOK). Your sales rep has never handled a contract for 2000 people, but develops a proposal in about a day which says CRUDLOK will:

1. Send an enrollment invitation to everyone the day after the contract is signed.
2. Enroll someone with just their first name and the last-4 of their national identifier.
3. Monitor each enrollee's credit for two years from the date of enrollment.
4. Send a monthly email with their credit rating and offers for credit-related services at market rates.
5. Charge your company 20% of the cost of any credit restoration.

You execute the contract and the enrollment invitations are emailed to the 2000 individuals. Three days later you sit down and document all that went well and all that could have gone better. You put it in a file to reference the next time an incident occurs.

Which of the following was done CORRECTLY during the above incident?

- A. Finding a vendor who will offer the affected individuals additional services

- B. Your assessment of which credit monitoring company you should hire
- C. The process by which affected individuals sign up for email notifications
- D. The speed at which you sat down to reflect and document the incident

Answer: D

Explanation:

This answer is the only thing that was done correctly during the incident, as it shows a good practice of learning from and improving on the incident response process. The speed at which you sat down to reflect and document the incident means that you did not delay or postpone this important step, which can help you to capture and analyze what went well and what could have gone better during the incident, as well as to identify any lessons learned, best practices or recommendations for future incidents. Documenting and reflecting on the incident can also help you to update and improve your privacy policies, procedures and safeguards, as well as to demonstrate your accountability and compliance with any legal or contractual obligations.

NEW QUESTION # 58

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