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To be eligible for the CIPM certification exam, candidates must have at least two years of experience in privacy management or a related field. Candidates must also complete the IAPP's CIPM training course or have an equivalent level of knowledge and experience. CIPM Exam consists of 90 multiple-choice questions and must be completed within two hours. Candidates who pass the exam will receive the CIPM certification, which is recognized globally as a symbol of excellence in privacy management.

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The CIPM exam covers a broad range of topics related to privacy management, including privacy program governance, privacy program operationalization, privacy program assessment, and privacy program communication. CIPM exam also covers the legal and regulatory frameworks related to privacy, such as GDPR, CCPA, and HIPAA. The CIPM Exam is designed for professionals with at least two years of experience in privacy management or a related field. CIPM exam consists of 90 multiple-choice questions and must be completed within two hours.

## IAPP Certified Information Privacy Manager (CIPM) Sample Questions (Q70-Q75):

### NEW QUESTION # 70

#### 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. Regarding the notification, which of the following would be the greatest concern?

- A. Using a postcard with the logo of the vendor who make the mistake instead of your company's logo.
- B. Informing the affected individuals that data from other individuals may have also been affected.
- **C. Collecting more personally identifiable information than necessary to provide updates to the affected individuals.**
- D. Trusting a vendor to send out a notice when they already failed once by not encrypting the database.

**Answer: C**

Explanation:

Explanation

This answer is the greatest concern regarding the notification, as it violates the data minimization principle and exposes the affected individuals to further privacy and security risks. Collecting more personally identifiable information than necessary to provide updates to the affected individuals means that the company is asking for their name, email address, and month and year of birth, which may not be relevant or proportionate for the purpose of sending email notifications. Collecting more information than necessary can also increase the likelihood of data breaches, identity theft, fraud, or misuse of the data by unauthorized or malicious parties.

## NEW QUESTION # 71

What is the function of the privacy operational life cycle?

- A. It establishes initial plans for privacy protection and implementation
- B. It allows privacy policies to mature to a fixed form
- C. It ensures that outdated privacy policies are retired on a set schedule
- **D. It allows the organization to respond to ever-changing privacy demands**

**Answer: D**

Explanation:

The privacy operational life cycle is a process that allows the organization to respond to ever-changing privacy demands by continuously monitoring and improving the privacy program. It consists of four phases: assess, protect, sustain, and respond. Each phase involves different activities and outputs that help the organization identify and manage privacy risks and opportunities. Reference: IAPP CIPM Study Guide, page 14.

#### NEW QUESTION # 72

Which of the following is an example of Privacy by Design (PbD)?

- A. The human resources group develops a training program for employees to become certified in privacy policy.
- B. A company hires a professional to structure a privacy program that anticipates the increasing demands of new laws.
- **C. The information technology group uses privacy considerations to inform the development of new networking software.**
- D. A labor union insists that the details of employers' data protection methods be documented in a new contract.

**Answer: C**

Explanation:

This is an example of Privacy by Design (PbD), which is an approach to systems engineering that integrates privacy into the design and development of products, services, and processes from the outset<sup>7</sup> PbD aims to ensure that privacy is embedded into the core functionality of any system or service, rather than being added as an afterthought or a trade-off. PbD is based on seven foundational principles: proactive not reactive; preventive not remedial; privacy as the default setting; privacy embedded into design; full functionality - positive-sum, not zero-sum; end-to-end security - full lifecycle protection; visibility and transparency - keep it open; and respect for user privacy - keep it user-centric<sup>8</sup>

#### NEW QUESTION # 73

What is the main purpose of a privacy program audit?

- A. To mitigate the effects of a privacy breach.
- **B. To ensure the adequacy of data protection procedures.**
- C. To make decisions on privacy staff roles and responsibilities.
- D. To justify a privacy department budget increase.

**Answer: B**

#### NEW QUESTION # 74

Which of the following is a physical control that can limit privacy risk?

- A. Encryption.
- B. Tokenization.
- **C. Keypad or biometric access.**
- D. user access reviews.

**Answer: C**

Explanation:

A physical control that can limit privacy risk is keypad or biometric access. This is a type of access control that restricts who can enter or access a physical location or device where personal data is stored or processed.

Keypad or biometric access requires a code or a biological feature (such as a fingerprint or a face scan) to authenticate the identity and authorization of the person seeking access. This can prevent unauthorized access, theft, loss, or damage of personal data by outsiders or insiders. . References: [CIPM - International Association of Privacy Professionals], [Free CIPM Study Guide - International Association of Privacy Professionals]

#### NEW QUESTION # 75

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