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QUESTION 1

SCENARIO

Please use the following to answer the next QUESTION:

As they company\\'s new chief executive officer, Thomas Goddard wants to be known as a leader in data protection. Goddard recently served as the chief financial officer of Hoopy.com, a pioneer in online video viewing with millions of users

around the world. Unfortunately, Hoopy is infamous within privacy protection circles for its ethically Questionable practices, including unauthorized sales of personal data to marketers. Hoopy also was the target of credit card data theft that

made headlines around the world, as at least two million credit card numbers were thought to have been pilfered despite the company\\'s claims that "appropriate" data protection safeguards were in place. The scandal affected the company\\'s

business as competitors were quick to market an increased level of protection while offering similar entertainment and media content. Within three weeks after the scandal broke, Hoopy founder and CEO Maxwell Martin, Goddard\\'s mentor,

was forced to step down.

Goddard, however, seems to have landed on his feet, securing the CEO position at your company, Medialite, which is just emerging from its start-up phase. He sold the company\\'s board and investors on his vision of Medialite building its

brand partly on the basis of industry-leading data protection standards and procedures.

He may have been a key part of a lapsed or even rogue organization in matters of privacy but now he claims to be reformed and a true believer in privacy protection. In his first week on the job, he calls you into his office and explains that your

primary work responsibility is to bring his vision for privacy to life. But you also detect some reservations. "We want Medialite to have absolutely the highest standards," he says. "In fact, I want us to be able to say that we are the clear industry

leader in privacy and data protection. However, I also need to be a responsible steward of the company\\'s finances. So, while I want the best solutions across the board, they also need to be cost effective."

You are told to report back in a week//s time with your recommendations. Charged with this ambiguous mission, you depart the executive suite, already considering your next steps.

You give a presentation to your CEO about privacy program maturity. What does it mean to have a "managed" privacy program, according to the AICPA/CICA Privacy Maturity Model?

A. Procedures or processes exist, however they are not fully documented and do not cover all relevant aspects.

B. Procedures and processes are fully documented and implemented, and cover all relevant aspects.

C. Reviews are conducted to assess the effectiveness of the controls in place.

D. Regular review and feedback are used to ensure continuous improvement toward optimization of the given process.

Correct Answer: C



Reference: https://vvena.nl/wpcontent/uploads/2018/04/aicpa_cica_privacy_maturity_model.pdf (page 2, 4th point under privacy maturity model)

QUESTION 2

Post-liquidation, a company that has acquired assets would require separate consent from a data subject if personally identifiable data were being retained for which purpose?

A. For tax purposes.

B. For analytical purposes.

- C. To be able to ensure payment of pension funds.
- D. To secure employment benefits for former employees.

Correct Answer: B

QUESTION 3

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.

How could the objection to Spencer\\'s training suggestion be addressed?

A. By requiring training only on an as-needed basis.

B. By offering alternative delivery methods for trainings.

C. By introducing a system of periodic refresher trainings.

D. By customizing training based on length of employee tenure.

Correct Answer: B

QUESTION 4

SCENARIO

Please use the following to answer the next QUESTION:

Amira is thrilled about the sudden expansion of NatGen. As the joint Chief Executive Officer (CEO) with her long-time business partner Sadie, Amira has watched the company grow into a major competitor in the green energy market. The

current line of products includes wind turbines, solar energy panels, and equipment for geothermal systems. A talented team of developers means that NatGen\\'s line of products will only continue to grow.

With the expansion, Amira and Sadie have received advice from new senior staff members brought on to help manage the company\\'s growth. One recent suggestion has been to combine the legal and security functions of the company to

ensure observance of privacy laws and the company\\'s own privacy policy. This sounds overly complicated to Amira, who wants departments to be able to use, collect, store, and dispose of customer data in ways that will best suit their needs.

She does not want administrative oversight and complex structuring to get in the way of people doing innovative work.

Sadie has a similar outlook. The new Chief Information Officer (CIO) has proposed what Sadie believes is an unnecessarily long timetable for designing a new privacy program. She has assured him that NatGen will use the best possible

equipment for electronic storage of customer and employee data. She simply needs a list of equipment and an estimate of its cost. But the CIO insists that many issues are necessary to consider before the company gets to that stage.

Regardless, Sadie and Amira insist on giving employees space to do their jobs. Both CEOs want to entrust the monitoring of employee policy compliance to low-level managers. Amira and Sadie believe these managers can adjust the



company privacy policy according to what works best for their particular departments. NatGen\\'s CEOs know that flexible interpretations of the privacy policy in the name of promoting green energy would be highly unlikely to raise any

concerns with their customer base, as long as the data is always used in course of normal business activities.

Perhaps what has been most perplexing to Sadie and Amira has been the CIO\\'s recommendation to institute a privacy compliance hotline. Sadie and Amira have relented on this point, but they hope to compromise by allowing employees to

take turns handling reports of privacy policy violations. The implementation will be easy because the employees need no special preparation. They will simply have to document any concerns they hear.

Sadie and Amira are aware that it will be challenging to stay true to their principles and guard against corporate culture strangling creativity and employee morale. They hope that all senior staff will see the benefit of trying a unique approach.

What Data Lifecycle Management (DLM) principle should the company follow if they end up allowing departments to interpret the privacy policy differently?

A. Prove the authenticity of the company\\'s records.

- B. Arrange for official credentials for staff members.
- C. Adequately document reasons for inconsistencies.
- D. Create categories to reflect degrees of data importance.

Correct Answer: C

QUESTION 5

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 want to point out that normal protocols have NOT been followed in this matter. Which process in particular has been neglected?

- A. Forensic inquiry.
- B. Data mapping.
- C. Privacy breach prevention.
- D. Vendor due diligence vetting.

Correct Answer: D

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