

## CIPM.exam

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### CIPM

Certified Information Privacy Manager



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## Exam A

### QUESTION 1

In regards to the collection of personal data conducted by an organization, what must the data subject be allowed to do?

- A. Evaluate the qualifications of a third-party processor before any data is transferred to that processor
- B. Obtain a guarantee of prompt notification in instances involving unauthorized access of the data
- C. Set a time-limit as to how long the personal data may be stored by the organization
- D. Challenge the authenticity of the personal data and have it corrected if needed



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**Correct Answer:** C

**Section:** (none)

**Explanation**

**Explanation/Reference:**

### QUESTION 2

Which term describes a piece of personal data that alone may not identify an individual?

- A. Unbundled data
- B. A singularity
- C. Non-aggregated infopoint
- D. A single attribute

**Correct Answer:** A

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 3**

Which is **NOT** an influence on the privacy environment external to an organization?

- A. Management team priorities
- B. Regulations
- C. Consumer demand
- D. Technological advances

**Correct Answer: C**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 4**

What is the **best** way to understand the location, use and importance of personal data within an organization?

- A. By analyzing the data inventory
- B. By testing the security of data systems
- C. By evaluating methods for collecting data
- D. By interviewing employees tasked with data entry

**Correct Answer: C**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 5**

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

**Correct Answer:** B

**Section:** (none)

**Explanation**

**Explanation/Reference:**

## QUESTION 6

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What is the **best** way to prevent the Finnish vendor from transferring data to another party?

- A. Restrict the vendor to using company security controls
- B. Offer company resources to assist with the processing
- C. Include transfer prohibitions in the vendor contract
- D. Lock the data down in its current location

**Correct Answer: C**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

## QUESTION 7

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What process can **best** answer your questions about the vendor's data security safeguards?

- A. A second-party of supplier audit
- B. A reference check with other clients
- C. A table top demonstration of a potential threat
- D. A public records search for earlier legal violations

**Correct Answer:** B

**Section:** (none)

**Explanation**

**Explanation/Reference:**

## QUESTION 8

### SCENARIO

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What is the **best** way for your vendor to be clear about the Society's breach notification expectations?

- A. Include notification provisions in the vendor contract
- B. Arrange regular telephone check-ins reviewing expectations
- C. Send a memorandum of understanding on breach notification
- D. Email the regulations that require breach notifications

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 9**

Which is **TRUE** about the scope and authority of data protection oversight authorities?

- A. The Office of the Privacy Commissioner (OPC) of Canada has the right to impose financial sanctions on violators
- B. All authority in the European Union rests with the Data Protection Commission (DPC)
- C. No one agency officially oversees the enforcement of privacy regulations in the United States
- D. The Asia-Pacific Economic Cooperation (APEC) Privacy Frameworks require all member nations to designate a national data protection authority

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**

Reference: [https://www.priv.gc.ca/en/opc-actions-and-decisions/ar\\_index/201617/ar\\_201617/](https://www.priv.gc.ca/en/opc-actions-and-decisions/ar_index/201617/ar_201617/)

**QUESTION 10**

Which of the following indicates you have developed the right privacy framework for your organization?

- A. It includes a privacy assessment of each major system
- B. It improves the consistency of the privacy program
- C. It works at a different type of organization
- D. It identifies all key stakeholders by name

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 11**

What is the function of the privacy operational life cycle?

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



D. It allows privacy policies to mature to a fixed form

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**

Reference: <https://www.bdo.com/blogs/nonprofit-standard/august-2018/guide-to-implementing-a-holistic-privacy-program>

#### **QUESTION 12**

Which is the **best** way to view an organization's privacy framework?

- A. As an industry benchmark that can apply to many organizations
- B. As a fixed structure that directs changes in the organization
- C. As an aspirational goal that improves the organization
- D. As a living structure that aligns to changes in the organization

**Correct Answer:** B

**Section:** (none)

**Explanation**



**Explanation/Reference:**

#### **QUESTION 13**

An organization is establishing a mission statement for its privacy program. Which of the following statements would be the **best** to use?

- A. This privacy program encourages cross-organizational collaboration which will stop all data breaches
- B. Our organization was founded in 2054 to reduce the chance of a future disaster like the one that occurred ten years ago. All individuals from our area of the country should be concerned about a future disaster. However, with our privacy program, they should not be concerned about the misuse of their information.
- C. The goal of the privacy program is to protect the privacy of all individuals who support our organization. To meet this goal, we must work to comply with all applicable privacy laws.
- D. In the next 20 years, our privacy program should be able to eliminate 80% of our current breaches. To do this, everyone in our organization must complete our annual privacy training course and all personally identifiable information must be inventoried.

**Correct Answer:** C

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 14**

**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!"

Since it is too late to restructure the contract with the vendor or prevent the app from being deployed, what is the **best** step for you to take next?

- A. Implement a more comprehensive suite of information security controls than the one used by the vendor
- B. Ask the vendor for verifiable information about their privacy protections so weaknesses can be identified
- C. Develop security protocols for the vendor and mandate that they be deployed
- D. Insist on an audit of the vendor's privacy procedures and safeguards

**Correct Answer: B**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

## QUESTION 15

### SCENARIO

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Which is the **best** first step in understanding the data security practices of a potential vendor?

- A. Requiring the vendor to complete a questionnaire assessing International Organization for Standardization (ISO) 27001 compliance.
- B. Conducting a physical audit of the vendor's facilities.
- C. Conducting a penetration test of the vendor's data security structure.
- D. Examining investigation records of any breaches the vendor has experienced.

**Correct Answer:** D

**Section:** (none)

**Explanation**

**Explanation/Reference:**

## QUESTION 16

### SCENARIO

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What safeguard can **most** efficiently ensure that privacy protection is a dimension of relationships with vendors?

- A. Include appropriate language about privacy protection in vendor contracts
- B. Perform a privacy audit on any vendor under consideration
- C. Require that a person trained in privacy protection be part of all vendor selection teams
- D. Do business only with vendors who are members of privacy trade associations

**Correct Answer: C**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

## **QUESTION 17**

### **SCENARIO**

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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 or vetting



**Correct Answer:** D

**Section:** (none)

**Explanation**

**Explanation/Reference:**

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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?



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

**Correct Answer: C**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 19**

What is **one** reason the European Union has enacted more comprehensive privacy laws than the United States?

- A. To ensure adequate enforcement of existing laws
- B. To ensure there is adequate funding for enforcement
- C. To allow separate industries to set privacy standards
- D. To allow the free movement of data between member countries

**Correct Answer:** D

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 20**

What is the **main** function of the Asia-Pacific Economic Cooperation Privacy Framework?

- A. Enabling regional data transfers
- B. Protecting data from parties outside the region
- C. Establishing legal requirements for privacy protection in the region
- D. Marketing privacy protection technologies developed in the region

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**

Reference: <https://iapp.org/resources/article/apec-privacy-framework/>

**QUESTION 21****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 elements of the incident did you adequately determine?

- A. The nature of the data elements impacted
- B. The likelihood the incident may lead to harm
- C. The likelihood that the information is accessible and usable
- D. The number of individuals whose information was affected



**Correct Answer:** B

**Section:** (none)

**Explanation**

**Explanation/Reference:**

## **QUESTION 22**

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

**Correct Answer:** D

**Section:** (none)

**Explanation**

**Explanation/Reference:**



### QUESTION 23

#### 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.

What is the **most** concerning limitation of the incident-response council?

- A. You convened it to diffuse blame
- B. The council has an overabundance of attorneys
- C. It takes eight hours of emails to come to a decision
- D. The leader just joined the company as a consultant

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**

## QUESTION 24

### 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 credit monitoring, which of the following would be the **greatest** concern?

- A. The vendor's representative does not have enough experience
- B. Signing a contract with CRUDLOK which lasts longer than one year

- C. The company did not collect enough identifiers to monitor one's credit
- D. You are going to notify affected individuals via a letter followed by an email

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**

## **QUESTION 25**

### **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.
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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. The process by which affected individuals sign up for email notifications
- B. Your assessment of which credit monitoring company you should hire
- C. The speed at which you sat down to reflect and document the incident
- D. Finding a vendor who will offer the affected individuals additional services

**Correct Answer:** C

**Section:** (none)

**Explanation**

**Explanation/Reference:**

#### QUESTION 26

In a sample metric template, what does "target" mean?

- A. The suggested volume of data to collect
- B. The percentage of completion
- C. The threshold for a satisfactory rating
- D. The frequency at which the data is sampled

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 27**

What should a privacy professional keep in mind when selecting which metrics to collect?

- A. Metrics should be reported to the public
- B. The number of metrics should be limited at first
- C. Metrics should reveal strategies for increasing company earnings
- D. A variety of metrics should be collected before determining their specific functions

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 28**

Under which circumstances would people who work in human resources be considered a secondary audience for privacy metrics?

- A. They do not receive training on privacy issues
- B. They do not interface with the financial office
- C. They do not have privacy policy as their main task
- D. They do not have frequent interactions with the public

**Correct Answer:** C

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 29**

What are you doing if you succumb to “overgeneralization” when analyzing data from metrics?

- A. Using data that is too broad to capture specific meanings
- B. Possessing too many types of data to perform a valid analysis
- C. Using limited data in an attempt to support broad conclusions

D. Trying to use several measurements to gauge one aspect of a program

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**

Reference: [https://www.researchgate.net/publication/226716755\\_The\\_Impact\\_of\\_Overfitting\\_and\\_Overggeneralization\\_on\\_the\\_Classification\\_Accuracy\\_in\\_Data\\_Mining](https://www.researchgate.net/publication/226716755_The_Impact_of_Overfitting_and_Overggeneralization_on_the_Classification_Accuracy_in_Data_Mining)

### QUESTION 30

All of the following changes will likely trigger a data inventory update EXCEPT?

- A. Outsourcing the Customer Relationship Management (CRM) function
- B. Acquisition of a new subsidiary
- C. Onboarding of a new vendor
- D. Passage of new a privacy regulation

**Correct Answer:** A

**Section:** (none)

**Explanation**



**Explanation/Reference:**

### QUESTION 31

What is **one** obligation that the General Data Protection Regulation (GDPR) imposes on data processors?

- A. To honor all data access requests from data subjects
- B. To inform data subjects about the identity and contact details of the controller
- C. To implement appropriate technical and organizational measures that ensure an appropriate level of security
- D. To carry out data protection impact assessments in cases where processing is likely to result in high risk to the rights and freedoms of individuals

**Correct Answer:** D

**Section:** (none)

**Explanation**

**Explanation/Reference:**

Reference: <https://www.whitecase.com/publications/article/chapter-12-impact-assessments-dpos-and-codes-conduct-unlocking-eu-general-data>



### QUESTION 32

Which of the following **best** describes proper compliance for an international organization using Binding Corporate Rules (BCRs) as a controller or processor?

- A. Employees must sign an ad hoc contractual agreement each time personal data is exported.
- B. All employees are subject to the rules in their entirety, regardless of where the work is taking place.
- C. All employees must follow the privacy regulations of the jurisdictions where the current scope of their work is established.
- D. Employees who control personal data must complete a rigorous certification procedure, as they are exempt from legal enforcement.

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**

Reference: <https://www.lexology.com/library/detail.aspx?q=80239951-01b8-409f-9019-953f5233852e>

### QUESTION 33

#### 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 are charged with making sure that privacy safeguards are in place for new products and initiatives. What is the **best** way to do this?

- A. Hold a meeting with stakeholders to create an interdepartmental protocol for new initiatives
- B. Institute Privacy by Design principles and practices across the organization
- C. Develop a plan for introducing privacy protections into the product development stage
- D. Conduct a gap analysis after deployment of new products, then mend any gaps that are revealed

**Correct Answer:** C

**Section:** (none)

**Explanation**

**Explanation/Reference:**

### QUESTION 34

#### SCENARIO

Please use the following to answer the next question:

As the 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.

The CEO likes what he's seen of the company's improved privacy program, but wants additional assurance that it is fully compliant with industry standards and reflects emerging best practices. What would **best** help accomplish this goal?

- A. An external audit conducted by a panel of industry experts
- B. An internal audit team accountable to upper management

- C. Creation of a self-certification framework based on company policies
- D. Revision of the strategic plan to provide a system of technical controls

**Correct Answer:** D

**Section:** (none)

**Explanation**

**Explanation/Reference:**

### QUESTION 35

A Human Resources director at a company reported that a laptop containing employee payroll data was lost on the train. Which action should the company take **IMMEDIATELY**?

- A. Report the theft to law enforcement
- B. Wipe the hard drive remotely
- C. Report the theft to the senior management
- D. Perform a multi-factor risk analysis

**Correct Answer:** D

**Section:** (none)

**Explanation**

**Explanation/Reference:**

### QUESTION 36

If an organization maintains a separate ethics office, to whom would its officer typically report to in order to retain the **greatest** degree of independence?

- A. The Board of Directors
- B. The Chief Financial Officer
- C. The Human Resources Director
- D. The organization's General Counsel

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**

Reference: <https://hbr.org/1994/03/managing-for-organizational-integrity>

**QUESTION 37**

Read the following steps:

- Perform frequent data back-ups.
  - Perform test restorations to verify integrity of backed-up data. ▪
- Maintain backed-up data offline or on separate servers.

These steps can help an organization recover from what?

- A. Phishing attacks
- B. Authorization errors
- C. Ransomware attacks
- D. Stolen encryption keys

**Correct Answer:** C

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 38****SCENARIO**

Please use the following to answer the next question:

As the director of data protection for Consolidated Records Corporation, you are justifiably pleased with your accomplishments so far. Your hiring was precipitated by warnings from regulatory agencies following a series of relatively minor data breaches that could easily have been worse. However, you have not had a reportable incident for the three years that you have been with the company. In fact, you consider your program a model that others in the data storage industry may note in their own program development.

You started the program at Consolidated from a jumbled mix of policies and procedures and worked toward coherence across departments and throughout operations. You were aided along the way by the program's sponsor, the vice president of operations, as well as by a Privacy Team that started from a clear understanding of the need for change.

Initially, your work was greeted with little confidence or enthusiasm by the company's "old guard" among both the executive team and frontline personnel working with data and interfacing with clients. Through the use of metrics that showed the costs not only of the breaches that had occurred, but also projections of the costs that easily could occur given the current state of operations, you soon had the leaders and key decision-makers largely on your side. Many of the other

employees were more resistant, but face-to-face meetings with each department and the development of a baseline privacy training program achieved sufficient “buy-in” to begin putting the proper procedures into place.

Now, privacy protection is an accepted component of all current operations involving personal or protected data and must be part of the end product of any process of technological development. While your approach is not systematic, it is fairly effective.

You are left contemplating: What must be done to maintain the program and develop it beyond just a data breach prevention program? How can you build on your success? What are the next action steps?

Which of the following would be **most** effectively used as a guide to a systems approach to implementing data protection?

- A. Data Life Cycle Management Standards
- B. United Nations Privacy Agency Standards
- C. International Organization for Standardization 9000 Series
- D. International Organization for Standardization 27000 Series

**Correct Answer:** D

**Section:** (none)

**Explanation**

**Explanation/Reference:**

Reference: <https://www.itgovernance.co.uk/blog/what-is-the-iso-27000-series-of-standards>

## QUESTION 39

### SCENARIO

Please use the following to answer the next question:

As the director of data protection for Consolidated Records Corporation, you are justifiably pleased with your accomplishments so far. Your hiring was precipitated by warnings from regulatory agencies following a series of relatively minor data breaches that could easily have been worse. However, you have not had a reportable incident for the three years that you have been with the company. In fact, you consider your program a model that others in the data storage industry may note in their own program development.

You started the program at Consolidated from a jumbled mix of policies and procedures and worked toward coherence across departments and throughout operations. You were aided along the way by the program’s sponsor, the vice president of operations, as well as by a Privacy Team that started from a clear understanding of the need for change.

Initially, your work was greeted with little confidence or enthusiasm by the company’s “old guard” among both the executive team and frontline personnel working with data and interfacing with clients. Through the use of metrics that showed the costs not only of the breaches that had occurred, but also projections of the costs that easily could occur given the current state of operations, you soon had the leaders and key decision-makers largely on your side. Many of the other

employees were more resistant, but face-to-face meetings with each department and the development of a baseline privacy training program achieved sufficient “buy-in” to begin putting the proper procedures into place.

Now, privacy protection is an accepted component of all current operations involving personal or protected data and must be part of the end product of any process of technological development. While your approach is not systematic, it is fairly effective.

You are left contemplating: What must be done to maintain the program and develop it beyond just a data breach prevention program? How can you build on your success? What are the next action steps?

How can Consolidated’s privacy training program **best** be further developed?

- A. Through targeted curricula designed for specific departments
- B. By adopting e-learning to reduce the need for instructors
- C. By using industry standard off-the-shelf programs
- D. Through a review of recent data breaches

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**



## QUESTION 40

### SCENARIO

Please use the following to answer the next question:

As the director of data protection for Consolidated Records Corporation, you are justifiably pleased with your accomplishments so far. Your hiring was precipitated by warnings from regulatory agencies following a series of relatively minor data breaches that could easily have been worse. However, you have not had a reportable incident for the three years that you have been with the company. In fact, you consider your program a model that others in the data storage industry may note in their own program development.

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Initially, your work was greeted with little confidence or enthusiasm by the company’s “old guard” among both the executive team and frontline personnel working with data and interfacing with clients. Through the use of metrics that showed the costs not only of the breaches that had occurred, but also projections of the costs that easily could occur given the current state of operations, you soon had the leaders and key decision-makers largely on your side. Many of the other

employees were more resistant, but face-to-face meetings with each department and the development of a baseline privacy training program achieved sufficient “buy-in” to begin putting the proper procedures into place.

Now, privacy protection is an accepted component of all current operations involving personal or protected data and must be part of the end product of any process of technological development. While your approach is not systematic, it is fairly effective.

You are left contemplating: What must be done to maintain the program and develop it beyond just a data breach prevention program? How can you build on your success? What are the next action steps?

What stage of the privacy operational life cycle **best** describes Consolidated's current privacy program?

- A. Assess
- B. Protect
- C. Respond
- D. Sustain

**Correct Answer:** D

**Section:** (none)

**Explanation**

**Explanation/Reference:**



#### **QUESTION 41**

##### **SCENARIO**

Please use the following to answer the next question:

As the director of data protection for Consolidated Records Corporation, you are justifiably pleased with your accomplishments so far. Your hiring was precipitated by warnings from regulatory agencies following a series of relatively minor data breaches that could easily have been worse. However, you have not had a reportable incident for the three years that you have been with the company. In fact, you consider your program a model that others in the data storage industry may note in their own program development.

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Initially, your work was greeted with little confidence or enthusiasm by the company's “old guard” among both the executive team and frontline personnel working with data and interfacing with clients. Through the use of metrics that showed the costs not only of the breaches that had occurred, but also projections of the costs that easily could occur given the current state of operations, you soon had the leaders and key decision-makers largely on your side. Many of the other

employees were more resistant, but face-to-face meetings with each department and the development of a baseline privacy training program achieved sufficient “buy-in” to begin putting the proper procedures into place.

Now, privacy protection is an accepted component of all current operations involving personal or protected data and must be part of the end product of any process of technological development. While your approach is not systematic, it is fairly effective.

You are left contemplating: What must be done to maintain the program and develop it beyond just a data breach prevention program? How can you build on your success? What are the next action steps?

What practice would afford the Director the most rigorous way to check on the program’s compliance with laws, regulations and industry best practices?

- A. Auditing
- B. Monitoring
- C. Assessment
- D. Forensics

**Correct Answer: B**

**Section: (none)**

**Explanation**

**Explanation/Reference:**



## **QUESTION 42**

### **SCENARIO**

Please use the following to answer the next question:

As the director of data protection for Consolidated Records Corporation, you are justifiably pleased with your accomplishments so far. Your hiring was precipitated by warnings from regulatory agencies following a series of relatively minor data breaches that could easily have been worse. However, you have not had a reportable incident for the three years that you have been with the company. In fact, you consider your program a model that others in the data storage industry may note in their own program development.

You started the program at Consolidated from a jumbled mix of policies and procedures and worked toward coherence across departments and throughout operations. You were aided along the way by the program’s sponsor, the vice president of operations, as well as by a Privacy Team that started from a clear understanding of the need for change.

Initially, your work was greeted with little confidence or enthusiasm by the company’s “old guard” among both the executive team and frontline personnel working with data and interfacing with clients. Through the use of metrics that showed the costs not only of the breaches that had occurred, but also projections of the costs that easily could occur given the current state of operations, you soon had the leaders and key decision-makers largely on your side. Many of the other



employees were more resistant, but face-to-face meetings with each department and the development of a baseline privacy training program achieved sufficient “buy-in” to begin putting the proper procedures into place.

Now, privacy protection is an accepted component of all current operations involving personal or protected data and must be part of the end product of any process of technological development. While your approach is not systematic, it is fairly effective.

You are left contemplating: What must be done to maintain the program and develop it beyond just a data breach prevention program? How can you build on your success? What are the next action steps?

What analytic can be used to track the financial viability of the program as it develops?

- A. Cost basis
- B. Gap analysis
- C. Return on investment
- D. Breach impact modeling

**Correct Answer: C**

**Section: (none)**

**Explanation**

**Explanation/Reference:**



### **QUESTION 43**

#### **SCENARIO**

Please use the following to answer the next question:

As the director of data protection for Consolidated Records Corporation, you are justifiably pleased with your accomplishments so far. Your hiring was precipitated by warnings from regulatory agencies following a series of relatively minor data breaches that could easily have been worse. However, you have not had a reportable incident for the three years that you have been with the company. In fact, you consider your program a model that others in the data storage industry may note in their own program development.

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employees were more resistant, but face-to-face meetings with each department and the development of a baseline privacy training program achieved sufficient “buy-in” to begin putting the proper procedures into place.

Now, privacy protection is an accepted component of all current operations involving personal or protected data and must be part of the end product of any process of technological development. While your approach is not systematic, it is fairly effective.

You are left contemplating: What must be done to maintain the program and develop it beyond just a data breach prevention program? How can you build on your success? What are the next action steps?

What process could **most** effectively be used to add privacy protections to a new, comprehensive program being developed at Consolidated?

- A. Privacy by Design
- B. Privacy Step Assessment
- C. Information Security Planning
- D. Innovation Privacy Standards

**Correct Answer:** C

**Section:** (none)

**Explanation**

**Explanation/Reference:**



#### QUESTION 44

The General Data Protection Regulation (GDPR) specifies fines that may be levied against data controllers for certain infringements. Which of the following will be subject to administrative fines of up to 10 000 000 EUR, or in the case of an undertaking, up to 2% of the total worldwide annual turnover of the preceding financial year?

- A. Failure to demonstrate that consent was given by the data subject to the processing of their personal data where it is used as the basis for processing
- B. Failure to implement technical and organizational measures to ensure data protection is enshrined by design and default
- C. Failure to process personal information in a manner compatible with its original purpose
- D. Failure to provide the means for a data subject to rectify inaccuracies in personal data

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**

Reference: <https://gdpr-info.eu/art-8-gdpr/>

**QUESTION 45****SCENARIO**

Please use the following to answer the next question.

Manasa is a product manager at Omnipresent Omnimedia, where she is responsible for leading the development of the company's flagship product, the Handy Helper. The Handy Helper is an application that can be used in the home to manage family calendars, do online shopping, and schedule doctor appointments. After having had a successful launch in the United States, the Handy Helper is about to be made available for purchase worldwide.

The packaging and user guide for the Handy Helper indicate that it is a "privacy friendly" product suitable for the whole family, including children, but does not provide any further detail or privacy notice. In order to use the application, a family creates a single account, and the primary user has access to all information about the other users. Upon start up, the primary user must check a box consenting to receive marketing emails from Omnipresent Omnimedia and selected marketing partners in order to be able to use the application.

Sanjay, the head of privacy at Omnipresent Omnimedia, was working on an agreement with a European distributor of Handy Helper when he fielded many questions about the product from the distributor. Sanjay needed to look more closely at the product in order to be able to answer the questions as he was not involved in the product development process.

In speaking with the product team, he learned that the Handy Helper collected and stored all of a user's sensitive medical information for the medical appointment scheduler. In fact, all of the user's information is stored by Handy Helper for the additional purpose of creating additional products and to analyze usage of the product. This data is all stored in the cloud and is encrypted both during transmission and at rest.

Consistent with the CEO's philosophy that great new product ideas can come from anyone, all Omnipresent Omnimedia employees have access to user data under a program called "Eureka." Omnipresent Omnimedia is hoping that at some point in the future, the data will reveal insights that could be used to create a fully automated application that runs on artificial intelligence, but as of yet, Eureka is not well-defined and is considered a long-term goal.

What step in the system development process did Manasa skip?

- A. Obtain express written consent from users of the Handy Helper regarding marketing
- B. Work with Sanjay to review any necessary privacy requirements to be built into the product
- C. Certify that the Handy Helper meets the requirements of the EU-US Privacy Shield Framework
- D. Build the artificial intelligence feature so that users would not have to input sensitive information into the Handy Helper

**Correct Answer: C**

**Section: (none)**

**Explanation**

**Explanation/Reference:**



<https://vceplus.com/>

