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Question 1

Question Type: MultipleChoice

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?

Options:

- 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.

Answer:

B

Explanation:

This answer is the primary data protection issue with cloud computing that Albert should be concerned about, as it can affect the confidentiality, integrity and availability of the data that is stored and processed on the cloud. Outdated security frameworks refer to the

lack of or insufficient technical and organizational measures that are implemented by the cloud service provider or the cloud user to protect the data from unauthorized or unlawful access, use, disclosure, alteration or destruction. Outdated security frameworks can include weak encryption, authentication, authorization, logging, monitoring, backup or recovery mechanisms, as well as inadequate policies, procedures, standards or best practices for data security. Outdated security frameworks can expose the data to various threats and risks, such as cyberattacks, data breaches, data loss or corruption, or legal actions.

Question 2

Question Type: MultipleChoice

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

Options:

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

Answer:

D

Explanation:

A single attribute is a term that describes a piece of personal data that alone may not identify an individual, such as a first name or a zip code. However, when combined with other attributes, it may become identifiable. Reference: IAPP CIPM Study Guide, page 18.

Question 3

Question Type: MultipleChoice

What does it mean to "rationalize" data protection requirements?

Options:

- A-** Evaluate the costs and risks of applicable laws and regulations and address those that have the greatest penalties
- B-** Look for overlaps in laws and regulations from which a common solution can be developed

- C- Determine where laws and regulations are redundant in order to eliminate some from requiring compliance
- D- Address the less stringent laws and regulations, and inform stakeholders why they are applicable

Answer:

B

Explanation:

To rationalize data protection requirements means to look for overlaps in laws and regulations from which a common solution can be developed. This can help simplify compliance efforts and reduce costs and complexity. Reference: IAPP CIPM Study Guide, page 16.

Question 4

Question Type: MultipleChoice

"Collection", "access" and "destruction" are aspects of what privacy management process?

Options:

- A- The data governance strategy
- B- The breach response plan
- C- The metric life cycle
- D- The business case

Answer:

C

Explanation:

The metric life cycle is a process that involves collecting, accessing, analyzing, reporting, and destroying data. These aspects are essential for measuring the performance and effectiveness of privacy programs. Reference: IAPP CIPM Study Guide, page 14.

Question 5

Question Type: MultipleChoice

SCENARIO

Please use the following to answer the next QUESTION:

For 15 years, Albert has worked at Treasure Box -- a mail order company in the United States (U.S.) that used to sell decorative candles around the world, but has recently decided to limit its shipments to customers in the 48 contiguous states. Despite his years of experience, Albert is often overlooked for managerial positions. His frustration about not being promoted, coupled with his recent interest in issues of privacy protection, have motivated Albert to be an agent of positive change.

He will soon interview for a newly advertised position, and during the interview, Albert plans on making executives aware of lapses in the company's privacy program. He feels certain he will be rewarded with a promotion for preventing negative consequences resulting from the company's outdated policies and procedures.

For example, Albert has learned about the AICPA (American Institute of Certified Public Accountants)/CICA (Canadian Institute of Chartered Accountants) Privacy Maturity Model (PMM). Albert thinks the model is a useful way to measure Treasure Box's ability to protect personal data

a. Albert has noticed that Treasure Box fails to meet the requirements of the highest level of maturity of this model; at his interview, Albert will pledge to assist the company with meeting this level in order to provide customers with the most rigorous security available.

Albert does want to show a positive outlook during his interview. He intends to praise the company's commitment to the security of customer and employee personal data against external threats. However, Albert worries about the high turnover rate within the company, particularly in the area of direct phone marketing. He sees many unfamiliar faces every day who are hired to do the marketing, and he often hears complaints in the lunch room regarding long hours and low pay, as well as what seems to be flagrant disregard for company procedures.

In addition, Treasure Box has had two recent security incidents. The company has responded to the incidents with internal audits and updates to security safeguards. However, profits still seem to be affected and anecdotal evidence indicates that many people still harbor mistrust. Albert wants to help the company recover. He knows there is at least one incident the public is unaware of, although Albert does not know the details. He believes the company's insistence on keeping the incident a secret could be a further detriment to its reputation. One further way that Albert wants to help Treasure Box regain its stature is by creating a toll-free number for customers, as

well as a more efficient procedure for responding to customer concerns by postal mail.

In addition to his suggestions for improvement, Albert believes that his knowledge of the company's recent business maneuvers will also impress the interviewers. For example, Albert is aware of the company's intention to acquire a medical supply company in the coming weeks.

With his forward thinking, Albert hopes to convince the managers who will be interviewing him that he is right for the job.

The company may start to earn back the trust of its customer base by following Albert's suggestion regarding which handling procedure?

Options:

- A- Access
- B- Correction
- C- Escalation
- D- Data Integrity

Answer:

B

Explanation:

This answer is the best way to describe the handling procedure that Albert suggests and that may help the company to earn back the trust of its customer base, as it involves creating a toll-free number for customers, as well as a more efficient procedure for responding to customer concerns by postal mail. Correction is a handling procedure that allows customers to request that the company updates, modifies or deletes their personal data if it is inaccurate, incomplete or outdated. Correction can help to enhance the quality and integrity of the data, as well as to respect the rights and preferences of the customers. Correction can also help to improve the customer satisfaction and loyalty, as well as to prevent or reduce any errors or disputes that may arise from incorrect or outdated data.

Question 6

Question Type: MultipleChoice

SCENARIO

Please use the following to answer the next QUESTION:

Penny has recently joined Ace Space, a company that sells homeware accessories online, as its new privacy officer. The company is based in California but thanks to some great publicity from a social media influencer last year, the company has received an influx of sales from the EU and has set up a regional office in Ireland to support this expansion. To become familiar with Ace Space's practices and assess what her privacy priorities will be, Penny has set up meetings with a number of colleagues to hear about the work that they have been doing and their compliance efforts.

Penny's colleague in Marketing is excited by the new sales and the company's plans, but is also concerned that Penny may curtail some of the growth opportunities he has planned. He tells her "I heard someone in the breakroom talking about some new privacy laws but I

really don't think it affects us. We're just a small company. I mean we just sell accessories online, so what's the real risk?" He has also told her that he works with a number of small companies that help him get projects completed in a hurry. "We've got to meet our deadlines otherwise we lose money. I just sign the contracts and get Jim in finance to push through the payment. Reviewing the contracts takes time that we just don't have."

In her meeting with a member of the IT team, Penny has learned that although Ace Space has taken a number of precautions to protect its website from malicious activity, it has not taken the same level of care of its physical files or internal infrastructure. Penny's colleague in IT has told her that a former employee lost an encrypted USB key with financial data on it when he left. The company nearly lost access to their customer database last year after they fell victim to a phishing attack. Penny is told by her IT colleague that the IT team "didn't know what to do or who should do what. We hadn't been trained on it but we're a small team though, so it worked out OK in the end." Penny is concerned that these issues will compromise Ace Space's privacy and data protection.

Penny is aware that the company has solid plans to grow its international sales and will be working closely with the CEO to give the organization a data "shake up". Her mission is to cultivate a strong privacy culture within the company.

Penny has a meeting with Ace Space's CEO today and has been asked to give her first impressions and an overview of her next steps.

To help Penny and her CEO with their objectives, what would be the most helpful approach to address her IT concerns?

Options:

- A- Roll out an encryption policy
- B- Undertake a tabletop exercise
- C- Ensure inventory of IT assets is maintained

D- Host a town hall discussion for all IT employees

Answer:

B

Explanation:

The most helpful approach to address Penny's IT concerns is to undertake a tabletop exercise. A tabletop exercise is a simulated scenario that tests the organization's ability to respond to a security incident, such as a data breach, a cyberattack, or a malware infection. A tabletop exercise typically involves:

A facilitator who guides the participants through the scenario and injects additional challenges or variables

A scenario that describes a plausible security incident based on real-world threats or past incidents

A set of objectives that define the expected outcomes and goals of the exercise

A set of questions that prompt the participants to discuss their roles, responsibilities, actions, decisions, and communications during the incident response process

A feedback mechanism that collects the participants' opinions and suggestions on how to improve the incident response plan and capabilities

A tabletop exercise can help Penny and her CEO with their objectives by:

Enhancing the awareness and skills of the IT team and other stakeholders involved in incident response

Identifying and addressing the gaps, weaknesses, and challenges in the incident response plan and process

Improving the coordination and collaboration among the IT team and other stakeholders during incident response

Evaluating and validating the effectiveness and efficiency of the incident response plan and process

Generating and implementing lessons learned and best practices for incident response

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