



IAPP

Exam Questions CIPM

Certified Information Privacy Manager (CIPM)

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NEW QUESTION 1

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.

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

Answer: B

NEW QUESTION 2

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.

Answer: B

NEW QUESTION 3

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.

Answer: A

NEW QUESTION 4

SCENARIO

Please use the following to answer the next QUESTION:

Henry Home Furnishings has built high-end furniture for nearly forty years. However, the new owner, Anton, has found some degree of disorganization after touring the company headquarters. His uncle Henry had always focused on production – not data processing – and Anton is concerned. In several storage rooms, he has found paper files, disks, and old computers that appear to contain the personal data of current and former employees and customers. Anton knows that a

single break-in could irrevocably damage the company's relationship with its loyal customers. He intends to set a goal of guaranteed zero loss of personal information. To this end, Anton originally planned to place restrictions on who was admitted to the physical premises of the company. However, Kenneth – his uncle's vice president and longtime confidante – wants to hold off on Anton's idea in favor of converting any paper records held at the company to electronic storage. Kenneth believes this process would only take one or two years. Anton likes this idea; he envisions a password-protected system that only he and Kenneth can access.

Anton also plans to divest the company of most of its subsidiaries. Not only will this make his job easier, but it will simplify the management of the stored data. The heads of subsidiaries like the art gallery and kitchenware store down the street will be responsible for their own information management. Then, any unneeded subsidiary data still in Anton's possession can be destroyed within the next few years.

After learning of a recent security incident, Anton realizes that another crucial step will be notifying customers. Kenneth insists that two lost hard drives in Question are not cause for concern; all of the data was encrypted and not sensitive in nature. Anton does not want to take any chances, however. He intends on sending notice letters to all employees and customers to be safe.

Anton must also check for compliance with all legislative, regulatory, and market requirements related to privacy protection. Kenneth oversaw the development of the company's online presence about ten years ago, but Anton is not confident about his understanding of recent online marketing laws. Anton is assigning another trusted employee with a law background the task of the compliance assessment. After a thorough analysis, Anton knows the company should be safe for another five years, at which time he can order another check.

Documentation of this analysis will show auditors due diligence.

Anton has started down a long road toward improved management of the company, but he knows the effort is worth it. Anton wants his uncle's legacy to continue for many years to come.

Which important principle of Data Lifecycle Management (DLM) will most likely be compromised if Anton executes his plan to limit data access to himself and Kenneth?

- A. Practicing data minimalism.
- B. Ensuring data retrievability.
- C. Implementing clear policies.
- D. Ensuring adequacy of infrastructure.

Answer: A

NEW QUESTION 5

SCENARIO

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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

Answer: C

NEW QUESTION 6

Incipia Corporation just trained the last of its 300 employees on their new privacy policies and procedures. If Incipia wanted to analyze the effectiveness of the training over the next 6 months, which form of trend analysis should they use?

- A. Cyclical.
- B. Irregular.
- C. Statistical.
- D. Standard variance.

Answer: C

NEW QUESTION 7

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

- 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: C

NEW QUESTION 8

SCENARIO

Please use the following to answer the next QUESTION:

Perhaps Jack Kelly should have stayed in the U.S. He enjoys a formidable reputation inside the company, Special Handling Shipping, for his work in reforming certain "rogue" offices. Last year, news broke that a police sting operation had revealed a drug ring operating in the Providence, Rhode Island office in the United States. Video from the office's video surveillance cameras leaked to news operations showed a drug exchange between Special Handling staff and undercover officers.

In the wake of this incident, Kelly had been sent to Providence to change the "hands off" culture that upper management believed had let the criminal elements conduct their illicit transactions. After a few weeks under Kelly's direction, the office became a model of efficiency and customer service. Kelly monitored his workers' activities using the same cameras that had recorded the illegal conduct of their former co-workers.

Now Kelly has been charged with turning around the office in Cork, Ireland, another trouble spot. The company has received numerous reports of the staff leaving the office unattended. When Kelly arrived, he found that even when present, the staff often spent their days socializing or conducting personal business on their mobile phones. Again, he observed their behaviors using surveillance cameras. He issued written reprimands to six staff members based on the first day of video alone.

Much to Kelly's surprise and chagrin, he and the company are now under investigation by the Data Protection Commissioner of Ireland for allegedly violating the privacy rights of employees. Kelly was told that the company's license for the cameras listed facility security as their main use, but he does not know why this matters. He has pointed out to his superiors that the company's training programs on privacy protection and data collection mention nothing about surveillance video.

You are a privacy protection consultant, hired by the company to assess this incident, report on the legal and compliance issues, and recommend next steps.

Knowing that the regulator is now investigating, what would be the best step to take?

- A. Consult an attorney experienced in privacy law and litigation.
- B. Use your background and knowledge to set a course of action.
- C. If you know the organization is guilty, advise it to accept the punishment.
- D. Negotiate the terms of a settlement before formal legal action takes place.

Answer: A

NEW QUESTION 9

Which of the following privacy frameworks are legally binding?

- A. Binding Corporate Rules (BCRs).
- B. Generally Accepted Privacy Principles (GAPP).
- C. Asia-Pacific Economic Cooperation (APEC) Privacy Framework.
- D. Organization for Economic Co-Operation and Development (OECD) Guidelines.

Answer: A

NEW QUESTION 10

What is the name for the privacy strategy model that describes delegated decision making?

- A. De-centralized.
- B. De-functionalized.
- C. Hybrid.
- D. Matrix.

Answer: A

NEW QUESTION 10

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

Answer: B

NEW QUESTION 15

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. 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. On which of the following topics does Albert most likely need additional knowledge?

- A. The role of privacy in retail companies
- B. The necessary maturity level of privacy programs
- C. The possibility of delegating responsibilities related to privacy
- D. The requirements for a managerial position with privacy protection duties

Answer: C

NEW QUESTION 19

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 element of the Privacy by Design (PbD) framework might the Handy Helper violate?

- A. Failure to obtain opt-in consent to marketing.
- B. Failure to observe data localization requirements.
- C. Failure to implement the least privilege access standard.
- D. Failure to integrate privacy throughout the system development life cycle.

Answer: B

NEW QUESTION 24

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.

The company has achieved a level of privacy protection that established new best practices for the industry. What is a logical next step to help ensure a high level of protection?

- A. Brainstorm methods for developing an enhanced privacy framework
- B. Develop a strong marketing strategy to communicate the company's privacy practices
- C. Focus on improving the incident response plan in preparation for any breaks in protection
- D. Shift attention to privacy for emerging technologies as the company begins to use them

Answer: C

NEW QUESTION 26

SCENARIO

Please use the following to answer the next QUESTION:

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

Upon hearing about the success of Briseño's program, Pacific Suites corporate Vice President Maryanne Silva-Hayes expanded the training and offered it

company-wide. Employees who completed the program received certification as a Pacific Suites Hospitality Supervisor. By 2001, the program had grown to provide industry-wide training. Personnel at hotels across the country could sign up and pay to take the course online. As the program became increasingly profitable, Pacific Suites developed an offshoot business, Pacific Hospitality Training (PHT). The sole focus of PHT was developing and marketing a variety of online courses and course progressions providing a number of professional certifications in the hospitality industry. By setting up a user account with PHT, course participants could access an information library, sign up for courses, and take end-of-course certification tests. When a user opened a new account, all information was saved by default, including the user's name, date of birth, contact information, credit card information, employer, and job title. The registration page offered an opt-out choice that users could click to not have their credit card numbers saved. Once a user name and password were established, users could return to check their course status, review and reprint their certifications, and sign up and pay for new courses. Between 2002 and 2008, PHT issued more than 700,000 professional certifications. PHT's profits declined in 2009 and 2010, the victim of industry downsizing and increased competition from e-learning providers. By 2011, Pacific Suites was out of the online certification business and PHT was dissolved. The training program's systems and records remained in Pacific Suites' digital archives, un-accessed and unused. Briseño and Silva-Hayes moved on to work for other companies, and there was no plan for handling the archived data after the program ended. After PHT was dissolved, Pacific Suites executives turned their attention to crucial day-to-day operations. They planned to deal with the PHT materials once resources allowed. In 2012, the Pacific Suites computer network was hacked. Malware installed on the online reservation system exposed the credit card information of hundreds of hotel guests. While targeting the financial data on the reservation site, hackers also discovered the archived training course data and registration accounts of Pacific Hospitality Training's customers. The result of the hack was the exfiltration of the credit card numbers of recent hotel guests and the exfiltration of the PHT database with all its contents. A Pacific Suites systems analyst discovered the information security breach in a routine scan of activity reports. Pacific Suites quickly notified credit card companies and recent hotel guests of the breach, attempting to prevent serious harm. Technical security engineers faced a challenge in dealing with the PHT data. PHT course administrators and the IT engineers did not have a system for tracking, cataloguing, and storing information. Pacific Suites has procedures in place for data access and storage, but those procedures were not implemented when PHT was formed. When the PHT database was acquired by Pacific Suites, it had no owner or oversight. By the time technical security engineers determined what private information was compromised, at least 8,000 credit card holders were potential victims of fraudulent activity. What must Pacific Suite's primary focus be as it manages this security breach?

- A. Minimizing the amount of harm to the affected individuals
- B. Investigating the cause and assigning responsibility
- C. Determining whether the affected individuals should be notified
- D. Maintaining operations and preventing publicity

Answer: A

NEW QUESTION 27

Under the General Data Protection Regulation (GDPR), when would a data subject have the right to require the erasure of his or her data without undue delay?

- A. When the data subject is a public authority.
- B. When the erasure is in the public interest.
- C. When the processing is carried out by automated means.
- D. When the data is no longer necessary for its original purpose.

Answer: A

NEW QUESTION 28

Which of the following is NOT typically a function of a Privacy Officer?

- A. Managing an organization's information security infrastructure.
- B. Serving as an interdepartmental liaison for privacy concerns.
- C. Monitoring an organization's compliance with privacy laws.
- D. Responding to information access requests from the public.

Answer: D

NEW QUESTION 29

SCENARIO

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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.

Based on Albert's observations, executive leadership should most likely pay closer attention to what?

- A. Awareness campaigns with confusing information
- B. Obsolete data processing systems
- C. Outdated security frameworks
- D. Potential in-house threats

Answer: C

NEW QUESTION 31

SCENARIO

Please use the following to answer the next QUESTION:

Ben works in the IT department of IgNight, Inc., a company that designs lighting solutions for its clients. Although IgNight's customer base consists primarily of offices in the US, some individuals have been so impressed by the unique aesthetic and energy-saving design of the light fixtures that they have requested IgNight's installations in their homes across the globe.

One Sunday morning, while using his work laptop to purchase tickets for an upcoming music festival, Ben happens to notice some unusual user activity on company files. From a cursory review, all the data still appears to be where it is meant to be but he can't shake off the feeling that something is not right. He knows that it is a possibility that this could be a colleague performing unscheduled maintenance, but he recalls an email from his company's security team reminding employees to be on alert for attacks from a known group of malicious actors specifically targeting the industry.

Ben is a diligent employee and wants to make sure that he protects the company but he does not want to bother his hard-working colleagues on the weekend. He is going to discuss the matter with this manager first thing in the morning but wants to be prepared so he can demonstrate his knowledge in this area and plead his case for a promotion.

To determine the steps to follow, what would be the most appropriate internal guide for Ben to review?

- A. Incident Response Plan.
- B. Code of Business Conduct.
- C. IT Systems and Operations Handbook.
- D. Business Continuity and Disaster Recovery Plan.

Answer: B

NEW QUESTION 32

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.

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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.

The senior advisor, Spencer, has a misconception regarding?

- A. The amount of responsibility that a data controller retains.
- B. The appropriate role of an organization's security department.
- C. The degree to which training can lessen the number of security incidents.
- D. The role of Human Resources employees in an organization's privacy program.

Answer: C

NEW QUESTION 33

SCENARIO

Please use the following to answer the next QUESTION:

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

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

By setting up a user account with PHT, course participants could access an information library, sign up for courses, and take end-of-course certification tests.

When a user opened a new account, all information was saved by default, including the user's name, date of birth, contact information, credit card information, employer, and job title. The registration page offered an opt-out choice that users could click to not have their credit card numbers saved. Once a user name and

password were established, users could return to check their course status, review and reprint their certifications, and sign up and pay for new courses. Between 2002 and 2008, PHT issued more than 700,000 professional certifications.

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

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

A Pacific Suites systems analyst discovered the information security breach in a routine scan of activity reports. Pacific Suites quickly notified credit card companies and recent hotel guests of the breach, attempting to prevent serious harm. Technical security engineers faced a challenge in dealing with the PHT data. PHT course administrators and the IT engineers did not have a system for tracking, cataloguing, and storing information. Pacific Suites has procedures in place for data access and storage, but those procedures were not implemented when PHT was formed. When the PHT database was acquired by Pacific Suites, it had no owner or oversight. By the time technical security engineers determined what private information was compromised, at least 8,000 credit card holders were potential victims of fraudulent activity.

In the Information Technology engineers had originally set the default for customer credit card information to "Do Not Save," this action would have been in line with what concept?

- A. Use limitation
- B. Privacy by Design
- C. Harm minimization
- D. Reactive risk management

Answer: B

NEW QUESTION 36

SCENARIO

Please use the following to answer the next QUESTION:

Paul Daniels, with years of experience as a CEO, is worried about his son Carlton's successful venture, Gadgo. A technological innovator in the communication industry that quickly became profitable, Gadgo has moved beyond its startup phase. While it has retained its vibrant energy, Paul fears that under Carlton's direction, the company may not be taking its risks or obligations as seriously as it needs to. Paul has hired you, a Privacy Consultant, to assess the company and report to both father and son. "Carlton won't listen to me," Paul says, "but he may pay attention to an expert."

Gadgo's workplace is a clubhouse for innovation, with games, toys, snacks, espresso machines, giant fish tanks and even an iguana who regards you with little interest. Carlton, too, seems bored as he describes to you the company's procedures and technologies for data protection. It's a loose assemblage of controls, lacking consistency and with plenty of weaknesses. "This is a technology company," Carlton says. "We create. We innovate. I don't want unnecessary measures that will only slow people down and clutter their thoughts."

The meeting lasts until early evening. Upon leaving, you walk through the office it looks as if a strong windstorm has recently blown through, with papers scattered across desks and tables and even the floor. A "cleaning crew" of one teenager is emptying the trash bins. A few computers have been left on for the night, others are missing. Carlton takes note of your attention to this: "Most of my people take their laptops home with them, or use their own tablets or phones. I want them to use whatever helps them to think and be ready day or night for that great insight. It may only come once!"

What phase in the Privacy Maturity Model (PMM) does Gadgo's privacy program best exhibit?

- A. Ad hoc.
- B. Defined.
- C. Repeatable.
- D. Managed.

Answer: A

NEW QUESTION 37

Which statement is FALSE regarding the use of technical security controls?

- A. Technical security controls are part of a data governance strategy.
- B. Technical security controls deployed for one jurisdiction often satisfy another jurisdiction.
- C. Most privacy legislation lists the types of technical security controls that must be implemented.
- D. A person with security knowledge should be involved with the deployment of technical security controls.

Answer: B

NEW QUESTION 38

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.

Answer: C

NEW QUESTION 43

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 a new privacy regulation.

Answer: A

NEW QUESTION 47

As a Data Protection Officer, one of your roles entails monitoring changes in laws and regulations and updating policies accordingly. How would you most effectively execute this responsibility?

- A. Consult an external lawyer.
- B. Regularly engage regulators.
- C. Attend workshops and interact with other professionals.
- D. Subscribe to email list-serves that report on regulatory changes.

Answer: D

NEW QUESTION 52

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

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

Answer: A

NEW QUESTION 53

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.

What information will be LEAST crucial from a privacy perspective in Penny's review of vendor contracts?

- A. Audit rights
- B. Liability for a data breach
- C. Pricing for data security protections
- D. The data a vendor will have access to

Answer: C

NEW QUESTION 54

SCENARIO

Please use the following to answer the next QUESTION:

Paul Daniels, with years of experience as a CEO, is worried about his son Carlton's successful venture, Gadgo. A technological innovator in the communication industry that quickly became profitable, Gadgo has moved beyond its startup phase. While it has retained its vibrant energy, Paul fears that under Carlton's direction, the company may not be taking its risks or obligations as seriously as it needs to. Paul has hired you, a Privacy Consultant, to assess the company and report to both father and son. "Carlton won't listen to me," Paul says, "but he may pay attention to an expert."

Gadgo's workplace is a clubhouse for innovation, with games, toys, snacks. espresso machines, giant fish tanks and even an iguana who regards you with little interest. Carlton, too, seems bored as he describes to you the company's procedures and technologies for data protection. It's a loose assemblage of controls, lacking consistency and with plenty of weaknesses. "This is a technology company," Carlton says. "We create. We innovate. I don't want unnecessary measures that will only slow people down and clutter their thoughts."

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What would be the best kind of audit to recommend for Gadgo?

- A. A supplier audit.
- B. An internal audit.
- C. A third-party audit.
- D. A self-certification.

Answer: C

NEW QUESTION 56

SCENARIO

Please use the following to answer the next QUESTION:

Perhaps Jack Kelly should have stayed in the U.S. He enjoys a formidable reputation inside the company, Special Handling Shipping, for his work in reforming certain "rogue" offices. Last year, news broke that a police sting operation had revealed a drug ring operating in the Providence, Rhode Island office in the United States. Video from the office's video surveillance cameras leaked to news operations showed a drug exchange between Special Handling staff and undercover officers.

In the wake of this incident, Kelly had been sent to Providence to change the "hands off" culture that upper management believed had let the criminal elements conduct their illicit transactions. After a few weeks under Kelly's direction, the office became a model of efficiency and customer service. Kelly monitored his workers' activities using the same cameras that had recorded the illegal conduct of their former co-workers.

Now Kelly has been charged with turning around the office in Cork, Ireland, another trouble spot. The company has received numerous reports of the staff leaving the office unattended. When Kelly arrived, he found that even when present, the staff often spent their days socializing or conducting personal business on their mobile phones. Again, he observed their behaviors using surveillance cameras. He issued written reprimands to six staff members based on the first day of video alone.

Much to Kelly's surprise and chagrin, he and the company are now under investigation by the Data Protection Commissioner of Ireland for allegedly violating the privacy rights of employees. Kelly was told that the company's license for the cameras listed facility security as their main use, but he does not know why this matters. He has pointed out to his superiors that the company's training programs on privacy protection and data collection mention nothing about surveillance video.

You are a privacy protection consultant, hired by the company to assess this incident, report on the legal and compliance issues, and recommend next steps. What does this example best illustrate about training requirements for privacy protection?

- A. Training needs must be weighed against financial costs.
- B. Training on local laws must be implemented for all personnel.
- C. Training must be repeated frequently to respond to new legislation.
- D. Training must include assessments to verify that the material is mastered.

Answer: B

NEW QUESTION 58

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.

Answer: A

NEW QUESTION 59

SCENARIO

Please use the following to answer the next QUESTION:

Henry Home Furnishings has built high-end furniture for nearly forty years. However, the new owner, Anton, has found some degree of disorganization after touring the company headquarters. His uncle Henry had always focused on production – not data processing – and Anton is concerned. In several storage rooms, he has found paper files, disks, and old computers that appear to contain the personal data of current and former employees and customers. Anton knows that a single break-in could irrevocably damage the company's relationship with its loyal customers. He intends to set a goal of guaranteed zero loss of personal information.

To this end, Anton originally planned to place restrictions on who was admitted to the physical premises of the company. However, Kenneth – his uncle's vice president and longtime confidante – wants to hold off on Anton's idea in favor of converting any paper records held at the company to electronic storage. Kenneth believes this process would only take one or two years. Anton likes this idea; he envisions a password-protected system that only he and Kenneth can access. Anton also plans to divest the company of most of its subsidiaries. Not only will this make his job easier, but it will simplify the management of the stored data. The heads of subsidiaries like the art gallery and kitchenware store down the street will be responsible for their own information management. Then, any unneeded subsidiary data still in Anton's possession can be destroyed within the next few years.

After learning of a recent security incident, Anton realizes that another crucial step will be notifying customers. Kenneth insists that two lost hard drives in Question are not cause for concern; all of the data was encrypted and not sensitive in nature. Anton does not want to take any chances, however. He intends on sending notice letters to all employees and customers to be safe.

Anton must also check for compliance with all legislative, regulatory, and market requirements related to privacy protection. Kenneth oversaw the development of the company's online presence about ten years ago, but Anton is not confident about his understanding of recent online marketing laws. Anton is assigning another trusted employee with a law background the task of the compliance assessment. After a thorough analysis, Anton knows the company should be safe for another five years, at which time he can order another check.

Documentation of this analysis will show auditors due diligence.

Anton has started down a long road toward improved management of the company, but he knows the effort is worth it. Anton wants his uncle's legacy to continue for many years to come.

To improve the facility's system of data security, Anton should consider following through with the plan for which of the following?

- A. Customer communication.
- B. Employee access to electronic storage.
- C. Employee advisement regarding legal matters.
- D. Controlled access at the company headquarters.

Answer: D

NEW QUESTION 62

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.

Answer: A

NEW QUESTION 65

What is the main purpose in notifying data subjects of a data breach?

- A. To avoid financial penalties and legal liability
- B. To enable regulators to understand trends and developments that may shape the law
- C. To ensure organizations have accountability for the sufficiency of their security measures
- D. To allow individuals to take any actions required to protect themselves from possible consequences

Answer: C

NEW QUESTION 66

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