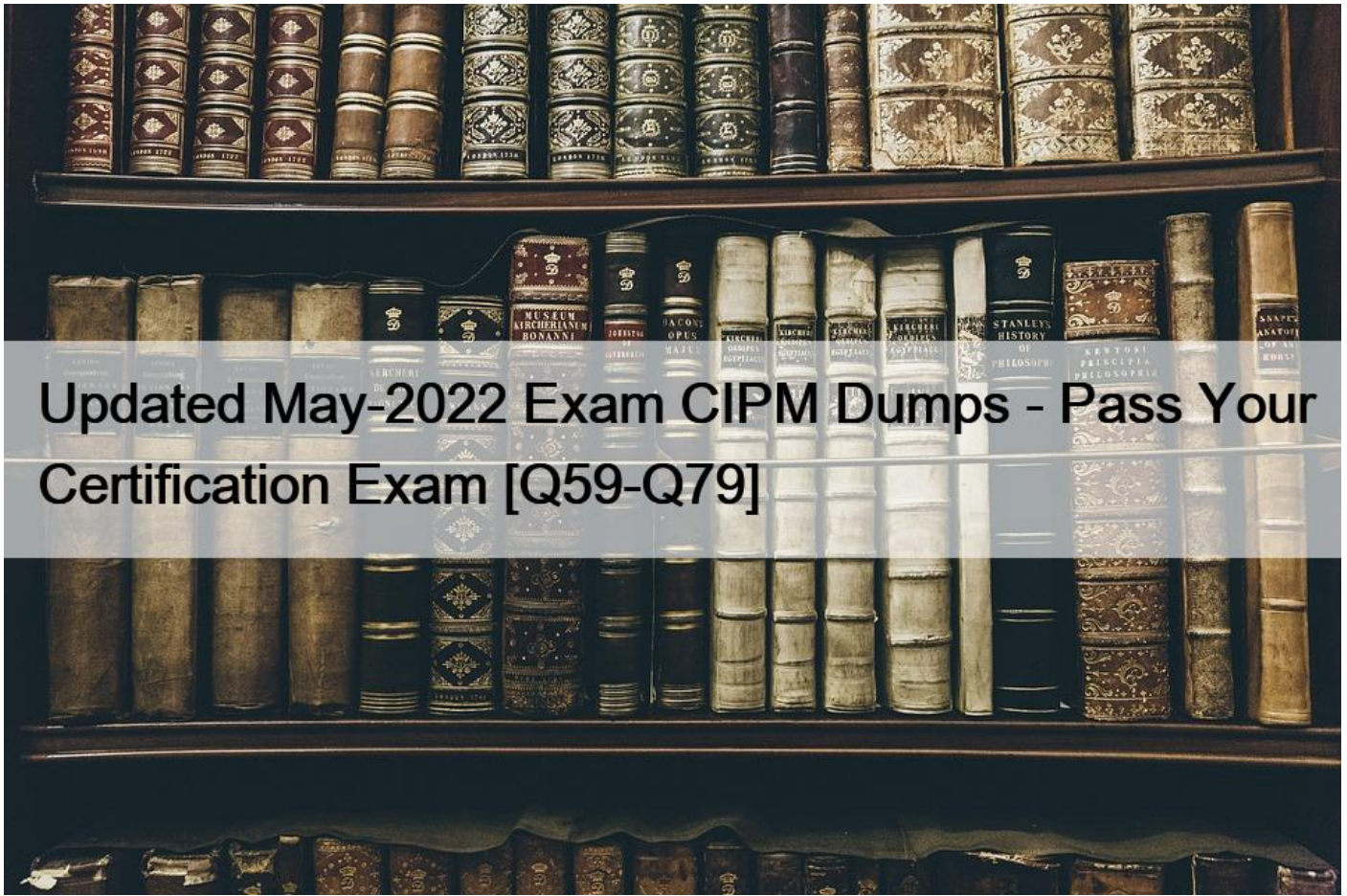


## Updated May-2022 Exam CIPM Dumps - Pass Your Certification Exam [Q59-Q79]



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### NEW QUESTION 59

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?

- \* The Board of Directors
- \* The Chief Financial Officer
- \* The Human Resources Director
- \* The organization's General Counsel

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

### NEW QUESTION 60

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?

- \* Data Life Cycle Management Standards
- \* United Nations Privacy Agency Standards
- \* International Organization for Standardization 9000 Series
- \* International Organization for Standardization 27000 Series

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

## NEW QUESTION 61

If your organization has a recurring issue with colleagues not reporting personal data breaches, all of the following are advisable to do EXCEPT?

- \* Carry out a root cause analysis on each breach to understand why the incident happened.
- \* Communicate to everyone that breaches must be reported and how they should be reported.
- \* Provide role-specific training to areas where breaches are happening so they are more aware.
- \* Distribute a phishing exercise to all employees to test their ability to recognize a threat attempt.

## NEW QUESTION 62

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?

- \* When the data subject is a public authority
- \* When the erasure is in the public interest
- \* When the processing is carried out by automated means
- \* When the data is no longer necessary for its original purpose

## NEW QUESTION 63

### SCENARIO

Please use the following to answer the next QUESTION:

Richard McAdams recently graduated law school and decided to return to the small town of Lexington, Virginia to help run his aging grandfather's law practice. The elder McAdams desired a limited, lighter role in the practice, with the hope that his grandson would eventually take over when he fully retires. In addition to hiring Richard, Mr. McAdams employs two paralegals, an administrative assistant, and a part-time IT specialist who handles all of their basic networking needs. He plans to hire more employees once Richard gets settled and assesses the office's strategies for growth.

Immediately upon arrival, Richard was amazed at the amount of work that needed to be done in order to modernize the office, mostly in regard to the handling of clients' personal data. His first goal is to digitize all the records kept in file cabinets, as many of the documents contain personally identifiable financial and medical data. Also, Richard has noticed the massive amount of copying by the administrative assistant throughout the day, a practice that not only adds daily to the number of files in the file cabinets, but may create security issues unless a formal policy is firmly in place. Richard is also concerned with the overuse of the communal copier/printer located in plain view of clients who frequent the building. Yet another area of concern is the use of the same fax machine by all of the employees. Richard hopes to reduce its use dramatically in order to ensure that personal data receives the utmost security and protection, and eventually move toward a strict Internet faxing policy by the year's end.

Richard expressed his concerns to his grandfather, who agreed, that updating data storage, data security, and an overall approach to increasing the protection of personal data in all facets is necessary. Mr. McAdams granted him the freedom and authority to do so. Now Richard is not only beginning a career as an attorney, but also functioning as the privacy officer of the small firm. Richard plans to meet with the IT employee the following day, to get insight into how the office computer system is currently set-up and managed.

Which of the following policy statements needs additional instructions in order to further protect the personal data of their clients?

- \* All faxes sent from the office must be documented and the phone number used must be double checked to ensure a safe arrival.
- \* All unused copies, prints, and faxes must be discarded in a designated recycling bin located near the work station and emptied daily.
- \* Before any copiers, printers, or fax machines are replaced or resold, the hard drives of these devices must be deleted before leaving the office.
- \* When sending a print job containing personal data, the user must not leave the information visible on the computer screen following the print command and must retrieve the printed document immediately.

## NEW QUESTION 64

### 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?

- \* Ad hoc.
- \* Defined.
- \* Repeatable.
- \* Managed.

### NEW QUESTION 65

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

- \* Using data that is too broad to capture specific meanings
- \* Possessing too many types of data to perform a valid analysis
- \* Using limited data in an attempt to support broad conclusions
- \* Trying to use several measurements to gauge one aspect of a program

Explanation/Reference: [https://www.researchgate.net/](https://www.researchgate.net/publication/226716755_The_Impact_of_Overfitting_and_Overggeneralization_on_the_Classification_Accuracy_in_Data_Mining)

publication/226716755\_The\_Impact\_of\_Overfitting\_and\_Overggeneralization\_on\_the\_Classification\_Accuracy\_in\_Data\_Mining

### NEW QUESTION 66

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

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

### NEW QUESTION 67

#### 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.

What would the company's legal team most likely recommend to Anton regarding his planned communication with customers?

- \* To send consistent communication.
- \* To shift to electronic communication.
- \* To delay communications until local authorities are informed.
- \* To consider under what circumstances communication is necessary.

## NEW QUESTION 68

Which of the documents below assists the Privacy Manager in identifying and responding to a request from an individual about what personal information the organization holds about them with whom the information is shared?

- \* Risk register
- \* Privacy policy
- \* Records retention schedule
- \* Personal information inventory

## NEW QUESTION 69

### SCENARIO

Please use the following to answer the next QUESTION:

Richard McAdams recently graduated law school and decided to return to the small town of Lexington, Virginia to help run his aging grandfather's law practice. The elder McAdams desired a limited, lighter role in the practice, with the hope that his grandson would eventually take over when he fully retires. In addition to hiring Richard, Mr. McAdams employs two paralegals, an administrative assistant, and a part-time IT specialist who handles all of their basic networking needs. He plans to hire more employees once Richard gets settled and assesses the office's strategies for growth.

Immediately upon arrival, Richard was amazed at the amount of work that needed to be done in order to modernize the office, mostly in regard to the handling of clients' personal data. His first goal is to digitize all the records kept in file cabinets, as many of the

documents contain personally identifiable financial and medical data. Also, Richard has noticed the massive amount of copying by the administrative assistant throughout the day, a practice that not only adds daily to the number of files in the file cabinets, but may create security issues unless a formal policy is firmly in place. Richard is also concerned with the overuse of the communal copier/printer located in plain view of clients who frequent the building. Yet another area of concern is the use of the same fax machine by all of the employees. Richard hopes to reduce its use dramatically in order to ensure that personal data receives the utmost security and protection, and eventually move toward a strict Internet faxing policy by the year's end.

Richard expressed his concerns to his grandfather, who agreed, that updating data storage, data security, and an overall approach to increasing the protection of personal data in all facets is necessary. Mr. McAdams granted him the freedom and authority to do so. Now Richard is not only beginning a career as an attorney, but also functioning as the privacy officer of the small firm. Richard plans to meet with the IT employee the following day, to get insight into how the office computer system is currently set-up and managed.

Richard believes that a transition from the use of fax machine to Internet faxing provides all of the following security benefits EXCEPT?

- \* Greater accessibility to the faxes at an off-site location.
- \* The ability to encrypt the transmitted faxes through a secure server.
- \* Reduction of the risk of data being seen or copied by unauthorized personnel.
- \* The ability to store faxes electronically, either on the user's PC or a password-protected network server.

## NEW QUESTION 70

Data retention and destruction policies should meet all of the following requirements EXCEPT?

- \* Data destruction triggers and methods should be documented.
- \* Personal information should be retained only for as long as necessary to perform its stated purpose.
- \* Documentation related to audit controls (third-party or internal) should be saved in a non-permanent format by default.
- \* The organization should be documenting and reviewing policies of its other functions to ensure alignment (e.g. HR, business development, finance, etc.).

## NEW QUESTION 71

### 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 can Sanjay do to minimize the risks of offering the product in Europe?

- \* Sanjay should advise the distributor that Omnipresent Omnimedia has certified to the Privacy Shield Framework and there should be no issues.
- \* Sanjay should work with Manasa to review and remediate the Handy Helper as a gating item before it is released.
- \* Sanjay should document the data life cycle of the data collected by the Handy Helper.
- \* Sanjay should write a privacy policy to include with the Handy Helper user guide.

## NEW QUESTION 72

### SCENARIO

Please use the following to answer the next question:

John is the new privacy officer at the prestigious international law firm A&M LLP. A&M LLP is very proud of its reputation in the practice areas of Trusts & Estates and Merger & Acquisition in both U.S. and Europe. During lunch with a colleague from the Information Technology department, John heard that the Head of IT, Derrick, is about to outsource the firm's email continuity service to their existing email security vendor MessageSafe.

Being successful as an email hygiene vendor, MessageSafe is expanding its business by leasing cloud infrastructure from Cloud Inc. to host email continuity service for A&M LLP.

John is very concerned about this initiative. He recalled that MessageSafe was in the news six months ago due to a security breach. Immediately, John did a quick research of MessageSafe's previous breach and learned that the breach was caused by an unintentional mistake by an IT administrator. He scheduled a meeting with Derrick to address his concerns.

At the meeting, Derrick emphasized that email is the primary method for the firm's lawyers to communicate with clients, thus it is critical to have the email continuity service to avoid any possible email downtime. Derrick has been using the anti-spam service provided by MessageSafe for five years and is very happy with the quality of service provided by MessageSafe. In addition to the significant discount offered by MessageSafe, Derrick emphasized that he can also speed up the onboarding process since the firm already has a service contract in place with MessageSafe. The existing on-premises email continuity solution is about to reach its end of life very soon and he doesn't have the time or resource to look for another solution. Furthermore, the off-premises email continuity service will only be turned on when the email service at A&M LLP's primary and secondary data centers are both down, and the email messages stored at MessageSafe site for continuity service will be automatically deleted after 30 days.

Which of the following is the most effective control to enforce MessageSafe's implementation of appropriate technical countermeasures to protect the personal data received from A&M LLP?

- \* MessageSafe must apply due diligence before trusting Cloud Inc. with the personal data received from A&M LLP.
- \* MessageSafe must flow-down its data protection contract terms with A&M LLP to Cloud Inc.
- \* MessageSafe must apply appropriate security controls on the cloud infrastructure.
- \* MessageSafe must notify A&M LLP of a data breach.

### NEW QUESTION 73

How are individual program needs and specific organizational goals identified in privacy framework development?

- \* By employing metrics to align privacy protection with objectives
- \* Through conversations with the privacy team
- \* By employing an industry-standard needs analysis
- \* Through creation of the business case

### NEW QUESTION 74

#### 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.

What metric can Goddard use to assess whether costs associated with implementing new privacy protections are justified?

- \* Compliance ratio
- \* Cost-effective mean
- \* Return on investment
- \* Implementation measure

### NEW QUESTION 75

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

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

### NEW QUESTION 76



## 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?

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

## NEW QUESTION 77

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

- \* They do not receive training on privacy issues
- \* They do not interface with the financial office
- \* They do not have privacy policy as their main task
- \* They do not have frequent interactions with the public

## NEW QUESTION 78

## 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 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?

- \* By requiring training only on an as-needed basis.
- \* By offering alternative delivery methods for trainings.
- \* By introducing a system of periodic refresher trainings.
- \* By customizing training based on length of employee tenure.

## NEW QUESTION 79

### 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?

- \* Audit rights
- \* Liability for a data breach
- \* Pricing for data security protections
- \* The data a vendor will have access to

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### IAPP CIPM Exam Syllabus Topics:

TopicDetailsTopic 1- Data-subject information requests and privacy rights- Privacy Operational Lifecycle: SustainTopic 2- Implement the Privacy Program Framework- Privacy Program FrameworkTopic 3- Integrate privacy requirements and

representation into functional areas across the organization- Information security practicesTopic 4- Privacy Operational Lifecycle- Privacy incident responseTopic 5- Document current baseline of your privacy program- Physical Assessments- Privacy by DesignTopic 6- Privacy Impact Assessments and Data Protection Impact Assessments- Other Organizational MeasuresTopic 7- Establish a Data Governance model- Developing a Privacy ProgramTopic 8- Create a company vision- Structure the privacy team- Establish a privacy programTopic 9- Develop the Privacy Program Framework- Develop Appropriate Metrics

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