



Certified Information Privacy Manager

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# **QUESTION 1**

### 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!"

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

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

Correct Answer: C

#### **QUESTION 2**

When vetting third-party processors of data protected by the General Data Protection Regulation (GDPR), why is it important to know the physical location of stored personal data from clients?

- A. To determine their incidence response time.
- B. To determine the country laws that would govern the contract.



- C. To determine the likelihood of a security breach in the location.
- D. To ensure the country has adequate protection or if safeguards are required.

Correct Answer: B

### **QUESTION 3**

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.

Correct Answer: D

# **QUESTION 4**

#### **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 Accountans)/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 in 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.

Based on Albert\\'s observations regarding recent security incidents, which of the following should he suggest as a priority for Treasure Box?

A. Appointing an internal ombudsman to address employee complaints regarding hours and pay.



B. Using a third-party auditor to address privacy protection issues not recognized by the prior internal audits.

C. Working with the Human Resources department to make screening procedures for potential employees more rigorous.

D. Evaluating the company\\'s ability to handle personal health information if the plan to acquire the medical supply company goes forward

Correct Answer: D

## **QUESTION 5**

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

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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.

Correct Answer: A

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