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QUESTION 1

SCENARIO

Please use the following to answer the next question:

Light Blue Health (LBH) is a healthcare technology company developing a new web and mobile application that collects personal health information from electronic patient health records. The application will use machine learning to recommend potential medical treatments and medications based on information collected from anonymized electronic health records. Patient users may also share health data collected from other mobile apps with the LBH app.

The application requires consent from the patient before importing electronic health records into the application and sharing it with their authorized physicians or healthcare provider. The patient can then review and share the recommended treatments with their physicians securely through the app. The patient user may also share location data and upload photos in the app. The patient user may also share location data and upload photos in the app for a healthcare provider to review along with the health record. The patient may also delegate access to the app.

LBH's privacy team meets with the Application development and Security teams, as well as key business stakeholders on a periodic basis. LBH also implements Privacy by Design (PbD) into the application development process.

The Privacy Team is conducting a Privacy Impact Assessment (PIA) to evaluate privacy risks during development of the application. The team must assess whether the application is collecting descriptive, demographic or any other user related data from the electronic health records that are not needed for the purposes of the application. The team is also reviewing whether the application may collect additional personal data for purposes for which the user did not provide consent.

What is the best way to ensure that the application only collects personal data that is needed to fulfill its primary purpose of providing potential medical and healthcare recommendations?

- A. Obtain consent before using personal health information for data analytics purposes.
- B. Provide the user with an option to select which personal data the application may collect.
- C. Disclose what personal data the application the collecting in the company Privacy Policy posted online.
- D. Document each personal category collected by the app and ensure it maps to an app function or feature.

Correct Answer: D

By documenting each personal data category collected by the app and ensuring that it maps to an app function or feature, Light Blue Health can help ensure that only necessary data is collected. This can help prevent over-collection of personal data and increase transparency about how user data is used.

QUESTION 2

An organization is evaluating a number of Machine Learning (ML) solutions to help automate a customer-facing part of its business. From a privacy perspective, the organization should first?

- A. Define their goals for fairness
- B. Document the distribution of bias scores
- C. Document the False Positive Rates (FPR).



D. Define how data subjects may object to the processing

Correct Answer: D

from a privacy perspective, an organization evaluating a number of Machine Learning (ML) solutions to help automate a customer-facing part of its business should first define how data subjects may object to the processing. This involves establishing clear and transparent mechanisms for individuals to exercise their rights with respect to their personal data.

QUESTION 3

SCENARIO

Tom looked forward to starting his new position with a U.S --based automobile leasing company (New Company), now operating in 32 states. New Company was recently formed through the merger of two prominent players, one from the eastern region (East Company) and one from the western region (West Company). Tom, a Certified Information Privacy Technologist (CIPT), is New Company\\'s first Information Privacy and Security Officer. He met today with Dick from East Company, and Harry, from West Company. Dick and Harry are veteran senior information privacy and security professionals at their respective companies, and continue to lead the east and west divisions of New Company. The purpose of the meeting was to conduct a SWOT (strengths/weaknesses/opportunities/threats) analysis for New Company. Their SWOT analysis conclusions are summarized below.

Dick was enthusiastic about an opportunity for the New Company to reduce costs and increase computing power and flexibility through cloud services. East Company had been contemplating moving to the cloud, but West Company already had a vendor that was providing it with software-as-a-service (SaaS). Dick was looking forward to extending this service to the eastern region. Harry noted that this was a threat as well, because West Company had to rely on the third party to protect its data.

Tom mentioned that neither of the legacy companies had sufficient data storage space to meet the projected growth of New Company, which he saw as a weakness. Tom stated that one of the team\\'s first projects would be to construct a consolidated New Company data warehouse. Tom would personally lead this project and would be held accountable if information was modified during transmission to or during storage in the new data warehouse.

Tom, Dick and Harry agreed that employee network access could be considered both a strength and a weakness. East Company and West Company had strong performance records in this regard; both had robust network access controls that were working as designed. However, during a projected year-long transition period, New Company employees would need to be able to connect to a New Company network while retaining access to the East Company and West Company networks.

When employees are working remotely, they usually connect to a Wi-Fi network. What should Harry advise for maintaining company security in this situation?

- A. Hiding wireless service set identifiers (SSID).
- B. Retaining the password assigned by the network.
- C. Employing Wired Equivalent Privacy (WEP) encryption.
- D. Using tokens sent through HTTP sites to verify user identity.

Correct Answer: A

Instead, Harry should advise employees to use strong passwords or other forms of secure authentication such as multi-factor authentication when connecting to Wi-Fi networks. He should also advise them to use secure methods of encryption such as WPA2 or WPA3 when transmitting sensitive company data over Wi-Fi.



QUESTION 4

SCENARIO

Looking back at your first two years as the Director of Personal Information Protection and Compliance for the Berry Country Regional Medical Center in Thorn Bay, Ontario, Canada, you see a parade of accomplishments, from developing state-of-the-art simulation based training for employees on privacy protection to establishing an interactive medical records system that is accessible by patients as well as by the medical personnel. Now, however, a question you have put off looms large: how do we manage all the data-not only records produced recently, but those still on hand from years ago? A data flow diagram generated last year shows multiple servers, databases, and work stations, many of which hold files that have not yet been incorporated into the new records system. While most of this data is encrypted, its persistence may pose security and compliance concerns. The situation is further complicated by several long-term studies being conducted by the medical staff using patient information. Having recently reviewed the major Canadian privacy regulations, you want to make certain that the medical center is observing them.

You also recall a recent visit to the Records Storage Section, often termed "The Dungeon" in the basement of the old hospital next to the modern facility, where you noticed a multitude of paper records. Some of these were in crates marked by years, medical condition or alphabetically by patient name, while others were in undifferentiated bundles on shelves and on the floor. The back shelves of the section housed data tapes and old hard drives that were often unlabeled but

appeared to be years old. On your way out of the dungeon, you noticed just ahead of you a small man in a lab coat who you did not recognize. He carried a batch of folders under his arm, apparently records he had removed from storage.

Which data lifecycle phase needs the most attention at this Ontario medical center?

- A. Retention
- B. Disclosure
- C. Collection
- D. Use

Correct Answer: A

QUESTION 5

An EU marketing company is planning to make use of personal data captured to make automated decisions based on profiling. In some cases, processing and automated decisions may have a legal effect on individuals, such as credit worthiness.

When evaluating the implementation of systems making automated decisions, in which situation would the company have to accommodate an individual's right NOT to be subject to such processing to ensure compliance under the General Data Protection Regulation (GDPR)?

- A. When an individual's legal status or rights are not affected by the decision.
- B. When there is no human intervention or influence in the decision-making process.
- C. When the individual has given explicit consent to such processing and suitable safeguards exist.
- D. When the decision is necessary for entering into a contract and the individual can contest the decision.



Correct Answer: B

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