

# CIPM<sup>Q&As</sup>

Certified Information Privacy Manager

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## QUESTION 1

You would like your organization to be independently audited to demonstrate compliance with international privacy standards and to identify gaps for remediation. Which type of audit would help you achieve this objective?

- A. First-party audit.
- B. Second-party audit.
- C. Third-party audit.
- D. Fourth-party audit.

Correct Answer: C

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## QUESTION 2

### SCENARIO

Please use the following to answer the next QUESTION:

As the 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.

You give a presentation to your CEO about privacy program maturity. What does it mean to have a "managed" privacy program, according to the AICPA/CICA Privacy Maturity Model?

- A. Procedures or processes exist, however they are not fully documented and do not cover all relevant aspects.
- B. Procedures and processes are fully documented and implemented, and cover all relevant aspects.
- C. Reviews are conducted to assess the effectiveness of the controls in place.
- D. Regular review and feedback are used to ensure continuous improvement toward optimization of the given process.

Correct Answer: C

Reference: [https://vvena.nl/wpcontent/uploads/2018/04/aicpa\\_cica\\_privacy\\_maturity\\_model.pdf](https://vvena.nl/wpcontent/uploads/2018/04/aicpa_cica_privacy_maturity_model.pdf) (page 2, 4th point under privacy maturity model)

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### QUESTION 3

A marketing team regularly exports spreadsheets to use for analysis including customer name, birthdate and home address. These spreadsheets are routinely shared between members of various teams via email even with employees that do not need such granular data.

What is the best way to lower overall risk?

- A. Set up security measures in the company's email client to prevent spreadsheets with customer information to accidentally being sent to external recipients.
- B. Anonymize exportable data by creating categories of information, like age range and geographic region.
- C. Allow the free exchange of information to continue but require spreadsheets be password protected.
- D. Allow only certain users to export customer data from the database.

Correct Answer: B

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### QUESTION 4

#### SCENARIO

Please use the following to answer the next QUESTION:

Amira is thrilled about the sudden expansion of NatGen. As the joint Chief Executive Officer (CEO) with her long-time business partner Sadie, Amira has watched the company grow into a major competitor in the green energy market. The

current line of products includes wind turbines, solar energy panels, and equipment for geothermal systems. A talented team of developers means that NatGen's line of products will only continue to grow.

With the expansion, Amira and Sadie have received advice from new senior staff members brought on to help manage the company's growth. One recent suggestion has been to combine the legal and security functions of the company to

ensure observance of privacy laws and the company's own privacy policy. This sounds overly complicated to Amira, who wants departments to be able to use, collect, store, and dispose of customer data in ways that will best suit their needs.

She does not want administrative oversight and complex structuring to get in the way of people doing innovative work.

Sadie has a similar outlook. The new Chief Information Officer (CIO) has proposed what Sadie believes is an unnecessarily long timetable for designing a new privacy program. She has assured him that NatGen will use the best possible

equipment for electronic storage of customer and employee data. She simply needs a list of equipment and an estimate of its cost. But the CIO insists that many issues are necessary to consider before the company gets to that stage. Regardless, Sadie and Amira insist on giving employees space to do their jobs. Both CEOs want to entrust the monitoring of employee policy compliance to low-level managers. Amira and Sadie believe these managers can adjust the

company privacy policy according to what works best for their particular departments. NatGen's CEOs know that flexible interpretations of the privacy policy in the name of promoting green energy would be highly unlikely to raise any concerns with their customer base, as long as the data is always used in course of normal business activities. Perhaps what has been most perplexing to Sadie and Amira has been the CIO's recommendation to institute a privacy compliance hotline. Sadie and Amira have relented on this point, but they hope to compromise by allowing employees to

take turns handling reports of privacy policy violations. The implementation will be easy

because the employees need no special preparation. They will simply have to document any concerns they hear.

Sadie and Amira are aware that it will be challenging to stay true to their principles and guard against corporate culture strangling creativity and employee morale. They hope that all senior staff will see the benefit of trying a unique approach.

Based on the scenario, what additional change will increase the effectiveness of the privacy compliance hotline?

- A. Outsourcing the hotline.
- B. A system for staff education.
- C. Strict communication channels.
- D. An ethics complaint department.

Correct Answer: B

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## QUESTION 5

The owner of an ice cream store has decided to begin accepting credit and debit cards for payment. To comply with industry standards, the owner will need to do which of the following?

- A. Seek ISO 27001 certification.
- B. Implement PCI data security controls.

C. Issue a privacy notice to store customers.

D. Use only vendor-supplied system passwords.

Correct Answer: B

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