

Certified Information Privacy Manager

1. 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(s): C

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

A. Using data that is too broad to capture specific meanings.

B. Possessing too many types of data to perform a valid analysis.

C. Using limited data in an attempt to support broad conclusions.

D. Trying to use several measurements to gauge one aspect of a program.

Answer(s): A

3. In addition to regulatory requirements and business practices, what important factors must a global privacy strategy consider?

A. Monetary exchange.

B. Geographic features.

C. Political history.

D. Cultural norms.

Answer(s): B

4. What have experts identified as an important trend in privacy program development?

A. The narrowing of regulatory definitions of personal information.

B. The rollback of ambitious programs due to budgetary restraints.

C. The movement beyond crisis management to proactive prevention.

D. The stabilization of programs as the pace of new legal mandates slows.

Answer(s): C

5. 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 step in the system development process did Manasa skip?

A. Obtain express written consent from users of the Handy Helper regarding marketing.

B. Work with Sanjay to review any necessary privacy requirements to be built into the product.

C. Certify that the Handy Helper meets the requirements of the EU-US Privacy Shield Framework.

D. Build the artificial intelligence feature so that users would not have to input sensitive information into the Handy Helper.

Answer(s): C

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What administrative safeguards should be implemented to protect the collected data while in use by Manasa and her product management team?

A. Document the data flows for the collected data.

B. Conduct a Privacy Impact Assessment (PIA) to evaluate the risks involved.

C. Implement a policy restricting data access on a "need to know" basis.

D. Limit data transfers to the US by keeping data collected in Europe within a local data center.

Answer(s): A

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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(s): D

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

A. Sanjay should advise the distributor that Omnipresent Omnimedia has certified to the Privacy Shield Framework and there should be no issues.

B. Sanjay should work with Manasa to review and remediate the Handy Helper as a gating item before it is released.

C. Sanjay should document the data life cycle of the data collected by the Handy Helper.

D. Sanjay should write a privacy policy to include with the Handy Helper user guide.

Answer(s): C

9. 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(s): B

10. An organization's privacy officer was just notified by the benefits manager that she accidentally sent out the retirement enrollment report of all employees to a wrong vendor.

Which of the following actions should the privacy officer take first?

A. Perform a risk of harm analysis.

B. Report the incident to law enforcement.

C. Contact the recipient to delete the email.

D. Send firm-wide email notification to employees.

Answer(s): A

11. 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(s): D

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Which of Anton's plans for improving the data management of the company is most unachievable?

A. His initiative to achieve regulatory compliance.

B. His intention to transition to electronic storage.

C. His objective for zero loss of personal information.

D. His intention to send notice letters to customers and employees.

Answer(s): C

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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(s): B

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In terms of compliance with regulatory and legislative changes, Anton has a misconception regarding?

A. The timeline for monitoring.

B. The method of recordkeeping.

C. The use of internal employees.

D. The type of required qualifications.

Answer(s): A

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

A. To send consistent communication.

B. To shift to electronic communication.

C. To delay communications until local authorities are informed.

D. To consider under what circumstances communication is necessary.

Answer(s): D

16. Why were the nongovernmental privacy organizations, Electronic Frontier Foundation (EFF) and Electronic Privacy Information Center (EPIC), established?

A. To promote consumer confidence in the Internet industry.

B. To improve the user experience during online shopping.

C. To protect civil liberties and raise consumer awareness.

D. To promote security on the Internet through strong encryption.

Answer(s): C

17. What is the main function of the Asia-Pacific Economic Cooperation Privacy Framework?

A. Enabling regional data transfers.

B. Protecting data from parties outside the region.

C. Establishing legal requirements for privacy protection in the region.

D. Marketing privacy protection technologies developed in the region.

Answer(s): A

18. Which of the following is TRUE about the Data Protection Impact Assessment (DPIA) process as required under the General Data Protection Regulation (GDPR)?

A. The DPIA result must be reported to the corresponding supervisory authority.

B. The DPIA report must be published to demonstrate the transparency of the data processing.

C. The DPIA must include a description of the proposed processing operation and its purpose.

D. The DPIA is required if the processing activity entails risk to the rights and freedoms of an EU individual.

Answer(s): D

19. 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(s): D

20. 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?

A. MessageSafe must apply due diligence before trusting Cloud Inc. with the personal data received from A&M LLP.

B. MessageSafe must flow-down its data protection contract terms with A&M LLP to Cloud Inc.

C. MessageSafe must apply appropriate security controls on the cloud infrastructure.

D. MessageSafe must notify A&M LLP of a data breach.

Answer(s): D
