



**Vendor: IAPP**

**Exam Code: CIPM**

**Exam Name: Certified Information Privacy Manager (CIPM) Exam**

**Version: Demo**

**Exam A**

**QUESTION 1**

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

**Correct Answer: B**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 2**

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

- A. By employing metrics to align privacy protection with objectives
- B. Through conversations with the privacy team
- C. By employing an industry-standard needs analysis
- D. Through creation of the business case

**Correct Answer: A**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

Reference: [https://www.nist.gov/system/files/documents/2020/01/16/NIST%20Privacy%20Framework\\_V1.0.pdf](https://www.nist.gov/system/files/documents/2020/01/16/NIST%20Privacy%20Framework_V1.0.pdf)

**QUESTION 3**

In privacy protection, what is a “covered entity”?

- A. Personal data collected by a privacy organization
- B. An organization subject to the privacy provisions of HIPAA
- C. A privacy office or team fully responsible for protecting personal information
- D. Hidden gaps in privacy protection that may go unnoticed without expert analysis

**Correct Answer: B**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

Reference: [https://www.healthit.gov/sites/default/files/pdf/privacy/onc\\_privacy\\_and\\_security\\_chapter4\\_v1\\_022112.pdf](https://www.healthit.gov/sites/default/files/pdf/privacy/onc_privacy_and_security_chapter4_v1_022112.pdf)

**QUESTION 4**

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

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

**Correct Answer: C**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

Reference: <https://www.privacypolicies.com/blog/privacy-by-design/>

**QUESTION 5**

What is the key factor that lays the foundation for all other elements of a privacy program?

- A. The applicable privacy regulations
- B. The structure of a privacy team
- C. A privacy mission statement
- D. A responsible internal stakeholder

**Correct Answer: A**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 6**

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 Accountants)/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 is 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.

In consideration of the company's new initiatives, which of the following laws and regulations would be **most** appropriate for Albert to mention at the interview as a priority concern for the privacy team?

- A. Gramm-Leach-Bliley Act (GLBA)
- B. The General Data Protection Regulation (GDPR)
- C. The Telephone Consumer Protection Act (TCPA)
- D. Health Insurance Portability and Accountability Act (HIPAA)

**Correct Answer: B**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 7** SCENARIO Please use the following to answer the next question:

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On which of the following topics does Albert **most likely** need additional knowledge?

- A. The role of privacy in retail companies
- B. The necessary maturity level of privacy programs
- C. The possibility of delegating responsibilities related to privacy
- D. The requirements for a managerial position with privacy protection duties

**Correct Answer: C**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 8** 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.

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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, executive leadership should **most likely** pay closer attention to what?

- A. Awareness campaigns with confusing information
- B. Obsolete data processing systems
- C. Outdated security frameworks
- D. Potential in-house threats

**Correct Answer: C**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 9 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.

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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

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 10** SCENARIO Please use the following to answer the next question:

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What is one important factor that Albert fails to consider regarding Treasure Box's response to their recent security incident?

- A. Who has access to the data
- B. What the nature of the data is
- C. How data at the company is collected
- D. How long data at the company is kept

**Correct Answer:** D

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 11** 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.

To help Penny and her CEO with their objectives, what would be the **most** helpful approach to address her IT concerns?

- A. Roll out an encryption policy
- B. Undertake a tabletop exercise
- C. Ensure inventory of IT assets is maintained
- D. Host a town hall discussion for all IT employees

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 12 SCENARIO** Please use the following to answer the next question:

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The company may start to earn back the trust of its customer base by following Albert's suggestion regarding which handling procedure?

- A. Access
- B. Correction
- C. Escalation
- D. Data Integrity

**Correct Answer:** D

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 13** “Collection,” “access” and “destruction” are aspects of what privacy management process?

- A. The data governance strategy
- B. The breach response plan
- C. The metric life cycle
- D. The business case

**Correct Answer: A**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 14** What does it mean to “rationalize” data protection requirements?

- A. Evaluate the costs and risks of applicable laws and regulations and address those that have the greatest penalties
- B. Look for overlaps in laws and regulations from which a common solution can be developed
- C. Determine where laws and regulations are redundant in order to eliminate some from requiring compliance
- D. Address the less stringent laws and regulations, and inform stakeholders why they are applicable

**Correct Answer: C**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 15 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 would be the **best** kind of audit to recommend for Gadgo?

- A. A supplier audit
- B. An internal audit
- C. A third-party audit
- D. A self-certification

**Correct Answer: C**

**Section: (none)**

**Explanation**



**Explanation/Reference:**

**QUESTION 16** SCENARIO Please use the following to answer the next question:

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- A. Ad hoc
- B. Defined
- C. Repeatable
- D. Managed

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**

Reference: [https://vvena.nl/wp-content/uploads/2018/04/aicpa\\_cica\\_privacy\\_maturity\\_model.pdf](https://vvena.nl/wp-content/uploads/2018/04/aicpa_cica_privacy_maturity_model.pdf) (page 2)

**QUESTION 17** Which statement is **FALSE** regarding the use of technical security controls?

- A. Most privacy legislation enumerates the types of technical security controls that must be implemented
- B. Technical security controls are part of a data governance strategy
- C. Technical security controls deployed for one jurisdiction often satisfy another jurisdiction
- D. A security engineer should be involved with the deployment of technical security controls

**Correct Answer:** C

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 18**

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

**Correct Answer:** C

**Section:** (none)

**Explanation**

**Explanation/Reference:**

Reference: [https://en.wikipedia.org/wiki/Electronic\\_Privacy\\_Information\\_Center](https://en.wikipedia.org/wiki/Electronic_Privacy_Information_Center)

**QUESTION 19**

An organization's business continuity plan or disaster recovery plan does **NOT** typically include what?

- A. Recovery time objectives
- B. Emergency Response Guidelines
- C. Statement of organizational responsibilities
- D. Retention schedule for storage and destruction of information

**Correct Answer:** D

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 20 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 has 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

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 21 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 has 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.

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

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 22 SCENARIO** Please use the following to answer the next question:

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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

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 23** SCENARIO Please use the following to answer the next question:

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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.

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

**Correct Answer: B**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 24** SCENARIO Please use the following to answer the next question:

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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.

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

**Correct Answer:** D

**Section:** (none)

**Explanation**

**Explanation/Reference:**

#### QUESTION 25

In regards to the collection of personal data conducted by an organization, what must the data subject be allowed to do?

- A. Evaluate the qualifications of a third-party processor before any data is transferred to that processor
- B. Obtain a guarantee of prompt notification in instances involving unauthorized access of the data
- C. Set a time-limit as to how long the personal data may be stored by the organization
- D. Challenge the authenticity of the personal data and have it corrected if needed

**Correct Answer:** C

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 26** Which term describes a piece of personal data that alone may not identify an individual?

- A. Unbundled data
- B. A singularity
- C. Non-aggregated infopoint
- D. A single attribute

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 27** Which is **NOT** an influence on the privacy environment external to an organization?

- A. Management team priorities
- B. Regulations
- C. Consumer demand
- D. Technological advances

**Correct Answer:** C

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 28**

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

**Correct Answer: C**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 29 SCENARIO** Please use the following to answer the next question:

Your organization, the Chicago (U.S.)-based Society for Urban Greenspace, has used the same vendor to operate all aspects of an online store for several years. As a small nonprofit, the Society cannot afford the higher-priced options, but you have been relatively satisfied with this budget vendor, Shopping Cart Saver (SCS). Yes, there have been some issues. Twice, people who purchased items from the store have had their credit card information used fraudulently subsequent to transactions on your site, but in neither case did the investigation reveal with certainty that the Society's store had been hacked. The thefts could have been employee-related.

Just as disconcerting was an incident where the organization discovered that SCS had sold information it had collected from customers to third parties. However, as Jason Roland, your SCS account representative, points out, it took only a phone call from you to clarify expectations and the "misunderstanding" has not occurred again.

As an information-technology program manager with the Society, the role of the privacy professional is only one of many you play. In all matters, however, you must consider the financial bottom line. While these problems with privacy protection have been significant, the additional revenues of sales of items such as shirts and coffee cups from the store have been significant. The Society's operating budget is slim, and all sources of revenue are essential.

Now a new challenge has arisen. Jason called to say that starting in two weeks, the customer data from the store would now be stored on a data cloud. "The good news," he says, "is that we have found a low-cost provider in Finland, where the data would also be held. So, while there may be a small charge to pass through to you, it won't be exorbitant, especially considering the advantages of a cloud."

Lately, you have been hearing about cloud computing and you know it's fast becoming the new paradigm for various applications. However, you have heard mixed reviews about the potential impacts on privacy protection. You begin to research and discover that a number of the leading cloud service providers have signed a letter of intent to work together on shared conventions and technologies for privacy protection. You make a note to find out if Jason's Finnish provider is signing on.

After conducting research, you discover a primary data protection issue with cloud computing. Which of the following should be your **biggest** concern?

- A. An open programming model that results in easy access
- B. An unwillingness of cloud providers to provide security information
- C. A lack of vendors in the cloud computing market
- D. A reduced resilience of data structures that may lead to data loss.

**Correct Answer: B**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 30 SCENARIO** Please use the following to answer the next question:

Your organization, the Chicago (U.S.)-based Society for Urban Greenspace, has used the same vendor to operate all aspects of an online store for several years. As a small nonprofit, the Society cannot afford the higher-priced options, but you have been relatively satisfied with this budget vendor, Shopping Cart Saver (SCS). Yes, there have been some issues. Twice, people who purchased items from the store have had their credit card information used fraudulently subsequent to transactions on your site, but in neither case did the investigation reveal with certainty that the Society's store had been hacked. The thefts could have been employee-related.

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What is the **best** way to prevent the Finnish vendor from transferring data to another party?

- A. Restrict the vendor to using company security controls
- B. Offer company resources to assist with the processing
- C. Include transfer prohibitions in the vendor contract
- D. Lock the data down in its current location

**Correct Answer: C**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 31 SCENARIO** Please use the following to answer the next question:

Your organization, the Chicago (U.S.)-based Society for Urban Greenspace, has used the same vendor to operate all aspects of an online store for several years. As a small nonprofit, the Society cannot afford the higher-priced options, but you have been relatively satisfied with this budget vendor, Shopping Cart Saver (SCS). Yes, there have been some issues. Twice, people who purchased items from the store have had their credit card information used fraudulently subsequent to transactions on your site, but in neither case did the investigation reveal with certainty that the Society's store had been hacked. The thefts could have been employee-related.

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What process can **best** answer your questions about the vendor's data security safeguards?

- A. A second-party of supplier audit
- B. A reference check with other clients
- C. A table top demonstration of a potential threat
- D. A public records search for earlier legal violations

**Correct Answer: B**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 32** SCENARIO Please use the following to answer the next question:

Your organization, the Chicago (U.S.)-based Society for Urban Greenspace, has used the same vendor to operate all aspects of an online store for several years. As a small nonprofit, the Society cannot afford the higher-priced options, but you have been relatively satisfied with this budget vendor, Shopping Cart Saver (SCS). Yes, there have been some issues. Twice, people who purchased items from the store have had their credit card information used fraudulently subsequent to transactions on your site, but in neither case did the investigation reveal with certainty that the Society's store had been hacked. The thefts could have been employee-related.

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What is the **best** way for your vendor to be clear about the Society's breach notification expectations?

- A. Include notification provisions in the vendor contract
- B. Arrange regular telephone check-ins reviewing expectations
- C. Send a memorandum of understanding on breach notification
- D. Email the regulations that require breach notifications

**Correct Answer: A**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 33** Which is **TRUE** about the scope and authority of data protection oversight authorities?

- A. The Office of the Privacy Commissioner (OPC) of Canada has the right to impose financial sanctions on violators
- B. All authority in the European Union rests with the Data Protection Commission (DPC)
- C. No one agency officially oversees the enforcement of privacy regulations in the United States
- D. The Asia-Pacific Economic Cooperation (APEC) Privacy Frameworks require all member nations to designate a national data protection authority

**Correct Answer: A**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

Reference: [https://www.priv.gc.ca/en/opc-actions-and-decisions/ar\\_index/201617/ar\\_201617/](https://www.priv.gc.ca/en/opc-actions-and-decisions/ar_index/201617/ar_201617/)

**QUESTION 34**

Which of the following indicates you have developed the right privacy framework for your organization?

- A. It includes a privacy assessment of each major system



- B. It improves the consistency of the privacy program
- C. It works at a different type of organization
- D. It identifies all key stakeholders by name

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 35** What is the function of the privacy operational life cycle?

- A. It establishes initial plans for privacy protection and implementation
- B. It allows the organization to respond to ever-changing privacy demands
- C. It ensures that outdated privacy policies are retired on a set schedule
- D. It allows privacy policies to mature to a fixed form

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**

Reference: <https://www.bdo.com/blogs/nonprofit-standard/august-2018/guide-to-implementing-a-holistic-privacy-program>

**QUESTION 36** Which is the **best** way to view an organization's privacy framework?

- A. As an industry benchmark that can apply to many organizations
- B. As a fixed structure that directs changes in the organization
- C. As an aspirational goal that improves the organization
- D. As a living structure that aligns to changes in the organization

**Correct Answer:** B

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 37**

An organization is establishing a mission statement for its privacy program. Which of the following statements would be the **best** to use?

- A. This privacy program encourages cross-organizational collaboration which will stop all data breaches
- B. Our organization was founded in 2054 to reduce the chance of a future disaster like the one that occurred ten years ago. All individuals from our area of the country should be concerned about a future disaster. However, with our privacy program, they should not be concerned about the misuse of their information.
- C. The goal of the privacy program is to protect the privacy of all individuals who support our organization. To meet this goal, we must work to comply with all applicable privacy laws.
- D. In the next 20 years, our privacy program should be able to eliminate 80% of our current breaches. To do this, everyone in our organization must complete our annual privacy training course and all personally identifiable information must be inventoried.

**Correct Answer:** C

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 38** 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?

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

**Correct Answer: B**  
**Section: (none)**  
**Explanation**

**Explanation/Reference:**

**QUESTION 39** SCENARIO Please use the following to answer the next question:

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is the **best** first step in understanding the data security practices of a potential vendor?

- A. Requiring the vendor to complete a questionnaire assessing International Organization for Standardization (ISO) 27001 compliance.
- B. Conducting a physical audit of the vendor's facilities.
- C. Conducting a penetration test of the vendor's data security structure.
- D. Examining investigation records of any breaches the vendor has experienced.

**Correct Answer: D**  
**Section: (none)**  
**Explanation**

**Explanation/Reference:**

**QUESTION 40** SCENARIO Please use the following to answer the next question:

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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**  
**Section: (none)**  
**Explanation**

**Explanation/Reference:**

**QUESTION 41** 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!" You want to point out that normal protocols have not been followed in this matter. Which process in particular has been neglected?

- A. Forensic inquiry
- B. Data mapping
- C. Privacy breach prevention
- D. Vendor due diligence or vetting

**Correct Answer: D**  
**Section: (none)**  
**Explanation**

**Explanation/Reference:**

**QUESTION 42** 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!" You see evidence that company employees routinely circumvent the privacy officer in developing new initiatives. How can you **best** draw attention to the scope of this problem?

- A. Insist upon one-on-one consultation with each person who works around the privacy officer.
- B. Develop a metric showing the number of initiatives launched without consultation and include it in reports, presentations, and consultation.
- C. Hold discussions with the department head of anyone who fails to consult with the privacy officer.
- D. Take your concerns straight to the Chief Executive Officer.

**Correct Answer:** C

**Section:** (none)

**Explanation**

**Explanation/Reference:**

#### QUESTION 43

What is **one** reason the European Union has enacted more comprehensive privacy laws than the United States?

- A. To ensure adequate enforcement of existing laws
- B. To ensure there is adequate funding for enforcement
- C. To allow separate industries to set privacy standards
- D. To allow the free movement of data between member countries

**Correct Answer:** D

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 44** 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

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**

Reference: <https://iapp.org/resources/article/apec-privacy-framework/>

**QUESTION 45** SCENARIO Please use the following to answer the next question:

You lead the privacy office for a company that handles information from individuals living in several countries throughout Europe and the Americas. You begin that morning's privacy review when a contracts officer sends you a message asking for a phone call. The message lacks clarity and detail, but you presume that data was lost.

When you contact the contracts officer, he tells you that he received a letter in the mail from a vendor stating that the vendor improperly shared information about your customers. He called the vendor and confirmed that your company recently surveyed exactly 2000 individuals about their most recent healthcare experience and sent those surveys to the vendor to transcribe it into a database, but the vendor forgot to encrypt the database as promised in the contract. As a result, the vendor has lost control of the data.

The vendor is extremely apologetic and offers to take responsibility for sending out the notifications. They tell you they set aside 2000 stamped postcards because that should reduce the time it takes to get the notice in the mail. One side is limited to their logo, but the other side is blank and they will accept whatever you want to write. You put their offer on hold and begin to develop the text around the space constraints. You are content to let the vendor's logo be associated with the notification.

The notification explains that your company recently hired a vendor to store information about their most recent experience at St. Sebastian Hospital's Clinic for Infectious Diseases. The vendor did not encrypt the information and no longer has control of it. All 2000 affected individuals are invited to sign-up for email notifications about their information. They simply need to go to your company's website and watch a quick advertisement, then provide their name, email address, and month and year of birth.

You email the incident-response council for their buy-in before 9 a.m. If anything goes wrong in this situation, you want to diffuse the blame across your colleagues. Over the next eight hours, everyone emails their comments back and forth. The consultant who leads the incident-response team notes that it is his first day with the company, but he has been in other industries for 45 years and will do his best. One of the three lawyers on the council causes the conversation to veer off course, but it eventually gets back on track. At the end of the day, they vote to proceed with the notification you wrote and use the vendor's postcards.

Shortly after the vendor mails the postcards, you learn the data was on a server that was stolen, and make the decision to have your company offer credit monitoring services. A quick internet search finds a credit monitoring company with a convincing name: Credit Under Lock and Key (CRUDLOK). Your sales rep has never handled a contract for 2000 people, but develops a proposal in about a day which says CRUDLOK will:

1. Send an enrollment invitation to everyone the day after the contract is signed.
2. Enroll someone with just their first name and the last-4 of their national identifier.
3. Monitor each enrollee's credit for two years from the date of enrollment.
4. Send a monthly email with their credit rating and offers for credit-related services at market rates.
5. Charge your company 20% of the cost of any credit restoration.

You execute the contract and the enrollment invitations are emailed to the 2000 individuals. Three days later you sit down and document all that went well and all that could have gone better. You put it in a file to reference the next time an incident occurs.

Which of the following elements of the incident did you adequately determine?

- A. The nature of the data elements impacted
- B. The likelihood the incident may lead to harm
- C. The likelihood that the information is accessible and usable
- D. The number of individuals whose information was affected

**Correct Answer: B**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 46 SCENARIO** Please use the following to answer the next question:

You lead the privacy office for a company that handles information from individuals living in several countries throughout Europe and the Americas. You begin that morning's privacy review when a contracts officer sends you a message asking for a phone call. The message lacks clarity and detail, but you presume that data was lost.

When you contact the contracts officer, he tells you that he received a letter in the mail from a vendor stating that the vendor improperly shared information about your customers. He called the vendor and confirmed that your company recently surveyed exactly 2000 individuals about their most recent healthcare experience and sent those surveys to the vendor to transcribe it into a database, but the vendor forgot to encrypt the database as promised in the contract. As a result, the vendor has lost control of the data.

The vendor is extremely apologetic and offers to take responsibility for sending out the notifications. They tell you they set aside 2000 stamped postcards because that should reduce the time it takes to get the notice in the mail. One side is limited to their logo, but the other side is blank and they will accept whatever you want to write. You put their offer on hold and begin to develop the text around the space constraints. You are content to let the vendor's logo be associated with the notification.

The notification explains that your company recently hired a vendor to store information about their most recent experience at St. Sebastian Hospital's Clinic for Infectious Diseases. The vendor did not encrypt the information and no longer has control of it. All 2000 affected individuals are invited to sign-up for email notifications about their information. They simply need to go to your company's website and watch a quick advertisement, then provide their name, email address, and month and year of birth.

You email the incident-response council for their buy-in before 9 a.m. If anything goes wrong in this situation, you want to diffuse the blame across your colleagues. Over the next eight hours, everyone emails their comments back and forth. The consultant who leads the incident-response team notes that it is his first day with the company, but he has been in other industries for 45 years and will do his best. One of the three lawyers on the council causes the conversation to veer off course, but it eventually gets back on track. At the end of the day, they vote to proceed with the notification you wrote and use the vendor's postcards.

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3. Monitor each enrollee's credit for two years from the date of enrollment.
4. Send a monthly email with their credit rating and offers for credit-related services at market rates.
5. Charge your company 20% of the cost of any credit restoration.

You execute the contract and the enrollment invitations are emailed to the 2000 individuals. Three days later you sit down and document all that went well and all that could have gone better. You put it in a file to reference the next time an incident occurs.

Regarding the notification, which of the following would be the **greatest** concern?

- A. Informing the affected individuals that data from other individuals may have also been affected.
- B. Collecting more personally identifiable information than necessary to provide updates to the affected individuals.
- C. Using a postcard with the logo of the vendor who make the mistake instead of your company's logo.
- D. Trusting a vendor to send out a notice when they already failed once by not encrypting the database.

**Correct Answer: D**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 47 SCENARIO** Please use the following to answer the next question:

You lead the privacy office for a company that handles information from individuals living in several countries throughout Europe and the Americas. You begin that morning's privacy review when a contracts officer sends you a message asking for a phone call. The message lacks clarity and detail, but you presume that data was lost.

When you contact the contracts officer, he tells you that he received a letter in the mail from a vendor stating that the vendor improperly shared information about your customers. He called the vendor and confirmed that your company recently surveyed exactly 2000 individuals about their most recent healthcare experience and sent those surveys to the vendor to transcribe it into a database, but the vendor forgot to encrypt the database as promised in the contract. As a result, the vendor has lost control of the data.

The vendor is extremely apologetic and offers to take responsibility for sending out the notifications. They tell you they set aside 2000 stamped postcards because that should reduce the time it takes to get the notice in the mail. One side is limited to their logo, but the other side is blank and they will accept whatever you want to write. You put their offer on hold and begin to develop the text around the space constraints. You are content to let the vendor's logo be associated with the notification.

The notification explains that your company recently hired a vendor to store information about their most recent experience at St. Sebastian Hospital's Clinic for Infectious Diseases. The vendor did not encrypt the information and no longer has control of it. All 2000 affected individuals are invited to sign-up for email notifications about their information. They simply need to go to your company's website and watch a quick advertisement, then provide their name, email address, and month and year of birth.

You email the incident-response council for their buy-in before 9 a.m. If anything goes wrong in this situation, you want to diffuse the blame across your colleagues. Over the next eight hours, everyone emails their comments back and forth. The consultant who leads the incident-response team notes that it is his first day with the company, but he has been in other industries for 45 years and will do his best. One of the three lawyers on the council causes the conversation to veer off course, but it eventually gets back on track. At the end of the day, they vote to proceed with the notification you wrote and use the vendor's postcards.

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3. Monitor each enrollee's credit for two years from the date of enrollment.
4. Send a monthly email with their credit rating and offers for credit-related services at market rates.
5. Charge your company 20% of the cost of any credit restoration.

You execute the contract and the enrollment invitations are emailed to the 2000 individuals. Three days later you sit down and document all that went well and all that could have gone better. You put it in a file to reference the next time an incident occurs.

What is the **most** concerning limitation of the incident-response council?

- A. You convened it to diffuse blame
- B. The council has an overabundance of attorneys
- C. It takes eight hours of emails to come to a decision
- D. The leader just joined the company as a consultant

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 48 SCENARIO** Please use the following to answer the next question:

You lead the privacy office for a company that handles information from individuals living in several countries throughout Europe and the Americas. You begin that morning's privacy review when a contracts officer sends you a message asking for a phone call. The message lacks clarity and detail, but you presume that data was lost.

When you contact the contracts officer, he tells you that he received a letter in the mail from a vendor stating that the vendor improperly shared information about your customers. He called the vendor and confirmed that your company recently surveyed exactly 2000 individuals about their most recent healthcare experience and sent those surveys to the vendor to transcribe it into a database, but the vendor forgot to encrypt the database as promised in the contract. As a result, the vendor has lost control of the data.

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5. Charge your company 20% of the cost of any credit restoration.

You execute the contract and the enrollment invitations are emailed to the 2000 individuals. Three days later you sit down and document all that went well and all that could have gone better. You put it in a file to reference the next time an incident occurs.

Regarding the credit monitoring, which of the following would be the **greatest** concern?

- A. The vendor's representative does not have enough experience
- B. Signing a contract with CRUDLOK which lasts longer than one year
- C. The company did not collect enough identifiers to monitor one's credit
- D. You are going to notify affected individuals via a letter followed by an email

**Correct Answer:** A

**Section:** (none)

**Explanation**

**Explanation/Reference:**

**QUESTION 49** SCENARIO Please use the following to answer the next question:

You lead the privacy office for a company that handles information from individuals living in several countries throughout Europe and the Americas. You begin that morning's privacy review when a contracts officer sends you a message asking for a phone call. The message lacks clarity and detail, but you presume that data was lost.

When you contact the contracts officer, he tells you that he received a letter in the mail from a vendor stating that the vendor improperly shared information about your customers. He called the vendor and confirmed that your company recently surveyed exactly 2000 individuals about their most recent healthcare experience and sent those surveys to the vendor to transcribe it into a database, but the vendor forgot to encrypt the database as promised in the contract. As a result, the vendor has lost control of the data.

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4. Send a monthly email with their credit rating and offers for credit-related services at market rates.
5. Charge your company 20% of the cost of any credit restoration.

You execute the contract and the enrollment invitations are emailed to the 2000 individuals. Three days later you sit down and document all that went well and all that could have gone better. You put it in a file to reference the next time an incident occurs.

Which of the following was done **CORRECTLY** during the above incident?

- A. The process by which affected individuals sign up for email notifications
- B. Your assessment of which credit monitoring company you should hire
- C. The speed at which you sat down to reflect and document the incident
- D. Finding a vendor who will offer the affected individuals additional services

**Correct Answer: C**

**Section: (none)**

**Explanation**

**Explanation/Reference:**

**QUESTION 50** In a sample metric template, what does "target" mean?

- A. The suggested volume of data to collect
- B. The percentage of completion
- C. The threshold for a satisfactory rating
- D. The frequency at which the data is sampled

**Correct Answer: A**





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