



Certified Information Privacy Professional/Europe (CIPP/E)

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## **QUESTION 1**

An organisation receives a request multiple times from a data subject seeking to exercise his rights with respect to his own personal data. Under what condition can the organisation charge the data subject for processing the request?

A. Only where the organisation can show that it is reasonable to do so because more than one request was made.

B. Only to the extent this is allowed under the restrictions on data subjects\\' rights introduced under Art 23 of GDPR.

C. Only where the administrative costs of taking the action requested exceeds a certain threshold.

D. Only if the organisation can demonstrate that the request is clearly excessive or misguided.

Correct Answer: D

### **QUESTION 2**

SCENARIO Please use the following to answer the next question: Zandelay Fashion (`Zandelay\\') is a successful international online clothing retailer that employs approximately 650 people at its headquarters based in Dublin, Ireland. Martin is their recently appointed data protection officer, who oversees the

company\\\'s compliance with the General Data Protection Regulation (GDPR) and other privacy legislation.

The company offers both male and female clothing lines across all age demographics, including children. In doing so, the company processes large amounts of information about such customers, including preferences and sensitive financial

information such as credit card and bank account numbers.

In an aggressive bid to build revenue growth, Jerry, the CEO, tells Martin that the company is launching a new mobile app and loyalty scheme that puts significant emphasis on profiling the company\\'s customers by analyzing their purchases.

Martin tells the CEO that:

(a) the potential risks of such activities means that Zandelay needs to carry out a data protection impact assessment to assess this new venture and its privacy implications; and (b) where the results of this assessment indicate a high risk in the absence of appropriate protection measures, Zandelay may have to undertake a prior consultation with the Irish Data Protection Commissioner before implementing the app and loyalty scheme.

Jerry tells Martin that he is not happy about the prospect of having to directly engage with a supervisory authority and having to disclose details of Zandelay\\'s business plan and associated processing activities. What would MOST effectively assist Zandelay in conducting their data protection impact assessment?

A. Information about DPIAs found in Articles 38 through 40 of the GDPR.

B. Data breach documentation that data controllers are required to maintain.

C. Existing DPIA guides published by local supervisory authorities.

D. Records of processing activities that data controllers are required to maintain.

Correct Answer: C



## **QUESTION 3**

According to the Personal Data Protection Commission\\'s (PDPC) "Guide to basic data anonymization techniques," recently adopted by the Spanish Data Protection Agency, which of the following is NOT a valid basic anonymization technique?

- A. Swapping.
- B. Generalization.
- C. Data Adjustment.
- D. Attribute Suppression.

Correct Answer: C

## **QUESTION 4**

Which kind of privacy notice, originally advocated by the Article 29 Working Party, is commonly recommended tor Albased technologies because of the way it provides processing information at specific points of data collection?

- A. Privacy dashboard notice
- B. Visualization notice.
- C. Just-in-lime notice.
- D. Layered notice.

Correct Answer: C

#### **QUESTION 5**

After leaving the EU under the terms of Brexit, the United Kingdom will seek an adequacy determination. What is the reason for this?

- A. The Insurance Commissioner determined that an adequacy determination is required by the Data Protection Act.
- B. Adequacy determinations automatically lapse when a Member State leaves the EU.
- C. The UK is now a third country because it\\'s no longer subject to the GDPR.
- D. The UK is less trustworthy now that its not part of the Union.

Correct Answer: C

Reference: https://www.euractiv.com/section/digital/news/commission-must-refuse-uk-data-adequacy-rights-group-



says/

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