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## **DSCI Certified Privacy Lead Assessor DCPLA certification Sample Questions (Q91-Q96):**

### **NEW QUESTION # 91**

Which of the following factors is least likely to be considered while implementing or augmenting data security solution for privacy protection?

- A. Information security infrastructure up-gradation in the organization
- B. Security controls deployment at the database level
- C. Classification of data type and its usage by various functions in the organization
- **D. Training and awareness program for third party organizations**

**Answer: D**

Explanation:

While training third-party organizations is a relevant privacy governance function, it is not a primary technical or operational consideration when implementing data security solutions.

The other options (A, B, and C) directly relate to core security architecture, system-level controls, and data governance - all essential for privacy protection at a system level.

Hence, D is least likely to be considered in technical implementation.

### **NEW QUESTION # 92**

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Based on the visibility exercise, the consultants created a single privacy policy applicable to all the client relationships and business functions. The policy detailed out what PI company deals with, how it is used, what security measures are deployed for protection, to whom it is shared, etc. Given the need to address all the client relationships and business functions, through a single policy, the privacy policy became very lengthy and complex. The privacy policy was published on company's intranet and also circulated to heads of all the relationships and functions. W.r.t. some client relationships, there was also confusion whether the privacy policy should be notified to the end customers of the clients as the company was directly collecting PI as part of the delivery of BPM services. The heads found it difficult to understand the policy (as they could not directly relate to it) and what actions they need to perform. To assuage their concerns, a training workshop was conducted for 1 day. All the relationship and function heads attended the training.

However, the training could not be completed in the given time, as there were numerous questions from the audiences and it took lot of time to clarify.

(Note: Candidates are requested to make and state assumptions wherever appropriate to reach a definitive conclusion) Introduction and Background XYZ is a major India based IT and Business Process Management (BPM) service provider listed at BSE and NSE. It has more than 1.5 lakh employees operating in 100 offices across 30 countries. It serves more than 500 clients across industry verticals - BFSI, Retail, Government, Healthcare, Telecom among others in Americas, Europe, Asia-Pacific, Middle East and Africa. The company provides IT services including application development and maintenance, IT Infrastructure management, consulting, among others. It also offers IT products mainly for its BFSI customers.

The company is witnessing phenomenal growth in the BPM services over last few years including Finance & Accounting including credit card processing, Payroll processing, Customer support, Legal Process Outsourcing, among others and has rolled out platform based services. Most of the company's revenue comes from the US from the BFSI sector. In order to diversify its portfolio, the company is looking to expand its operations in Europe. India, too has attracted company's attention given the phenomenal increase in domestic IT spend esp. by the government through various large scale IT projects. The company is also very aggressive in the cloud and mobility space, with a strong focus on delivery of cloud services. When it comes to expanding operations in Europe, company is facing difficulties in realizing the full potential of the market because of privacy related concerns of the clients arising from the stringent regulatory requirements based on EU General Data Protection Regulation (EU GDPR).

To get better access to this market, the company decided to invest in privacy, so that it is able to provide increased assurance to potential clients in the EU and this will also benefit its US operations because privacy concerns are also on rise in the US. It will also help company leverage outsourcing opportunities in the Healthcare sector in the US which would involve protection of sensitive medical records of the US citizens.

The company believes that privacy will also be a key differentiator in the cloud business going forward. In short, privacy was taken up as a strategic initiative in the company in early 2011.

Since XYZ had an internal consulting arm, it assigned the responsibility of designing and implementing an enterprise wide privacy program to the consulting arm. The consulting arm had very good expertise in information security consulting but had limited expertise in the privacy domain. The project was to be driven by CIO's office, in close consultation with the Corporate Information Security and Legal functions.

Do you agree with company's decision to have single privacy policy for all the relationships and functions?

Please justify your view. (250 to 500 words)

**Answer:**

Explanation:

Explanation

Yes, I agree with the company's decision to have a single privacy policy for all its relationships and functions.

Having a unified privacy policy allows the organization to communicate consistently across multiple channels of communication with customers, partners and vendors. It also ensures that all stakeholders are aware of their rights when dealing with personal data and makes it easier for them to understand their responsibilities when handling such information.

Moreover, having a standardized privacy policy helps to protect the company from potential legal repercussions due to inadequate protection of confidential data. The need for comprehensive protection is especially important in this age where cyber-attacks are becoming increasingly frequent and sophisticated. By putting in place a consistent framework that governs how any organization handles sensitive information can help reduce the risks associated with data breaches.

By demonstrating that the company takes strong measures to protect its customers' personal information, a single privacy policy can help boost the company's reputation and build trust with customers. Compliance with a variety of regulatory requirements is especially important for companies operating in regulated industries, such as banking and healthcare.

In addition, having a unified privacy policy allows organizations to maintain control over how their data is stored and processed. By monitoring who has access to confidential information, companies can identify any potential security vulnerabilities before they are exploited by malicious actors.

To conclude, I support XYZ's decision to have one privacy policy for all its relationships and functions.

Having a unified privacy policy can help the organization protect itself from potential legal risks, boost its reputation and maintain control over how data is stored and used. All in all, it is an important step to ensure that customer data is always kept safe and secure.

**NEW QUESTION # 93**

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The company has a very mature enterprise level access control policy to restrict access to information. There is a single sign-on platform available to access company resources such as email, intranet, servers, etc.

However, the access policy in client relationships varies depending on the client requirements. In fact, in many cases clients provide access ids to the employees of the company and manage them. Some clients also put technical controls to limit access to information such data masking tool, encryption, and anonymizing data, among others. Some clients also record the data collection process to monitor if the employee of the company does not collect more data than is required. Taking cue from the best practices implemented by the clients, the company, through the consultants, thought of realigning its access control policy to include control on data collection and data usage by the business functions and associated third parties. As a first step, the consultants advised the company to start monitoring the PI collection, usage and access by business functions without their knowledge. The IT function was given the responsibility to do the monitoring, as majority of the information was handled electronically. The analysis showed that many times, more information than necessary was collected by the some functions, however, no instances of misuse could be identified.

After few days of this exercise, a complaint was registered by a female company employee in the HR function against a male employee in IT support function. The female employee accused the male employee of accessing her photographs stored on a shared drive and posting it on a social networking site.

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What role can training and awareness play here? (250 to 500 words)

**Answer:**

Explanation:

See the answer in explanation below.

Explanation:

Training and awareness play an essential role in the successful implementation of a comprehensive privacy program. This is especially true for an organization that has limited expertise on the subject. Training and awareness help to ensure that everyone understands their obligations under the EU GDPR as well as other applicable laws and regulations, while also providing employees with best practices to ensure data protection.

One way to ensure optimal training and awareness is by creating a comprehensive training curriculum tailored specifically for XYZ's needs. The curriculum should cover topics such as data privacy rights, compliance requirements, impact assessment, access control measures, encryption technologies, incident response plans and more. Additionally, it should be augmented with practical examples so that employees can understand how these principles apply in different scenarios.

Moreover, a comprehensive awareness program should be established to keep all employees informed of the latest developments in privacy law. This can include newsletters, webinars and other communications that explain changes in laws or policies, provide information on new technologies, or even give advice on how to handle particular challenges.

Finally, management should ensure that there are measures in place to evaluate the effectiveness of the training and awareness programs. This can include surveys, interviews with staff members and other methods such as focus groups or workshops. All these means will help XYZ assess whether its employees understand their obligations under the GDPR and other applicable laws and regulations.

By creating a comprehensive training curriculum tailored specifically for its needs and establishing an effective awareness program, XYZ can ensure that everyone in the organization is better informed and aware of their responsibilities under the GDPR. This, in turn, will help to improve compliance with the applicable laws and regulations while protecting its customers' data. Ultimately, this will allow the company to realize its full potential on the European market.

By investing in training and awareness programs, XYZ demonstrates a commitment to proper privacy procedures which will not only benefit its operations in Europe but also those in the US. It is essential for any company operating today to prioritize privacy so that it can build client trust as well as remain compliant with regulations. With an effective training and awareness program in place, XYZ can confidently approach both current and potential clients knowing that their data will be secure.

Overall, training and awareness are important components of a successful privacy program. By investing in these programs, XYZ can ensure that everyone is informed and aware of their responsibilities under the GDPR and other applicable laws and regulations. This, in turn, will help to protect customer data while also improving compliance with applicable laws. Ultimately, this will help XYZ realize its full potential on the European market as well as build client trust.

By establishing a comprehensive training and awareness program, XYZ will be better prepared to handle the challenges of data privacy regulation. With the proper methods in place, the company can not only protect its customers' data but also remain compliant with laws and regulations. This, in turn, will help it achieve success on both domestic and international markets. Ultimately, investing in training and awareness is essential for any organization operating today.

#### **NEW QUESTION # 94**

Its mandatory for the assessee to provide the pre-requisites to the assessor organization before commencement of the first phase of assessment.

- A. True
- B. False

**Answer: A**

Which of the following measures can an organization implement to establish regulatory compliance intelligence? (Choose all that apply.)

- Answer: A,B,D**

\* Develop internal knowledge management systems for compliance obligations (D) Option C, however, relates more to access control and information security, which is typically addressed under technical and security safeguard controls, not under the RCI practice area.

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