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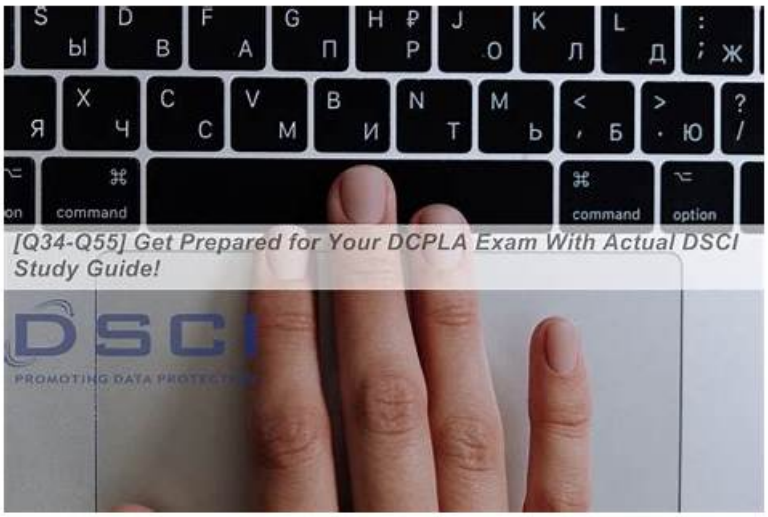

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DSCI Certified Privacy Lead Assessor DCPLA certification DCPLA Prüfungsfragen mit Lösungen (Q90-Q95):

90. Frage
Classify the following scenario as major or minor non-conformity.
"The organization defined information access and usage policy and rolled it out across the organization No formal exercise, however, was conducted to prepare the policy During implementation, certain discrepancies came out and these were addressed through appropriate policy revisions though this created a lot of hue and cry in the organization and the policy was criticized for adversely affecting productivity But with appropriate revisions and passage of time, the policy has been accepted In a recently conducted external audit one incident has come to light wherein the usage and access policy has been violated by an employee twice As per the auditor this incident should have been identified by the organization In its explanation to the auditor the management informed that appropriate access and usage monitoring mechanisms have been put in place but admitted that there may have been some lapses".

- A. Both Major & Minor
- B. Minor

- C. Major
- D. None of the above

Antwort: B

91. Frage
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PPP
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 FinanceandAccounting 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.
Given the confusion among relationship and function heads, how would you proceed to address the problem and ensure that policy is well understood and deployed? (250 to 500 words)

Antwort:

Begründung:
See the answer in explanation below.
Explanation:
In order to address the confusion among relationship and function heads, it is important to ensure that the privacy policy is effectively communicated and understood by all stakeholders. The following steps can be taken towards this end:
1. Awareness Campaigns - In order to educate the stakeholders about the importance of data privacy, various awareness campaigns should be launched through digital media, print media, and seminars. These campaigns must include topics such as why data privacy is important, the consequences of not adhering to the policy, and how to comply with it.
2. Training - In addition to awareness campaigns, proper training should be provided to all stakeholders on data privacy policies and procedures. The training should also focus on best practices such as secure coding, encryption techniques etc., so that they understand the importance of these security measures in protecting data from unauthorized access.
3. Policies and Procedures - All stakeholders should have access to a clear set of policies and procedures governing their actions related to data privacy. Such guidelines should include information about the types of sensitive information which needs to be kept

confidential, what constitutes a violation of the policy, and how to take corrective measures if a violation occurs.
4. Auditing - The effectiveness of all the policies and procedures should be regularly audited in order to ensure that the data privacy policy is being followed properly. Any discrepancies or violations must be reported immediately so that appropriate action can be taken.
5. Reporting Mechanism - A reporting mechanism should also be put into place for stakeholders to report any suspected errors or breaches in data privacy policies. This will help in identifying potential risks early on and taking corrective action as soon as possible.
These initiatives will not only reduce confusion among relationship and function heads but will also help build trust with customers by ensuring proper implementation of enterprise-wide privacy program, which in turn will help the company in leveraging outsourcing opportunities. Lastly, by following all these measures, the company will be able to demonstrate its commitment towards privacy and create a secure environment for its customers.
In conclusion, in order to ensure that policy is well understood and deployed, it is important to take appropriate steps such as launching awareness campaigns, providing training to stakeholders on data privacy policies, auditing policies and procedures regularly, and setting up a reporting mechanism for errors or breaches. Doing so will reduce confusion among relationship and function heads and help build trust with customers by ensuring proper implementation of an enterprise-wide privacy program.

92. Frage
Who is a Data Processor?

- A. Entity that collects personal data
- B. Entity that decides the means and purposes of processing
- C. Entity that acts on behalf of Data Fiduciary
- D. Entity that controls the data

Antwort: C

Begründung:
A Data Processor under the Digital Personal Data Protection Act, 2023 is any entity that processes personal data on behalf of a Data Fiduciary. It does not independently determine the purpose or means of processing but strictly follows the instructions of the Data Fiduciary. Therefore, D is the correct answer.

93. Frage
XYZ bank has recently decided to start offering online banking services. For doing so, the bank has outsourced its IT operations and processes to various third parties. Acknowledging privacy concerns, bank has decided to implement a privacy program. Assuming you have been tasked to deploy this framework for the bank, which of the following would most likely be your first step?

- A. Create an inventory of business processes that deal with personal information and identify the associated data element
- B. None of the above
- C. Ensure that bank is equipped to test the relevance of each legal and compliance requirement in its environment
- D. Assign privacy roles and responsibilities for process owners

Antwort: A

Begründung:
Under the "Visibility over Personal Information (VPI)" practice area of the DSCI Privacy Framework, the first and foundational step in any privacy implementation is to:
"Create an inventory of business processes and associated data elements involving personal information." This baseline mapping ensures that organizations understand what data is processed, where it resides, and how it flows across systems and third parties. This forms the basis for subsequent governance, risk assessment, and compliance alignment.

94. Frage
Entities should collect personal information from user that is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. This Privacy Principle is called:

- A. Storage Limitation
- B. Use Limitation
- C. Collection Limitation
- D. Accountability

Antwort: C

Begründung:
According to the DSCI Privacy Framework and aligned with global privacy principles such as those found in the OECD and APEC frameworks, "Collection Limitation" emphasizes that personal data should be collected in a manner that is lawful and fair, and should be limited to what is necessary for the identified purposes.
As per DSCI Assessment Framework for Privacy (DAF-P©), this principle ensures organizations collect only relevant data by minimizing unnecessary data acquisition, thereby reducing the privacy risks. The principle mandates:
"Personal data collected should be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed." This is designed to promote responsible data stewardship and ensure minimal exposure of individuals' personal information.

95. Frage
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