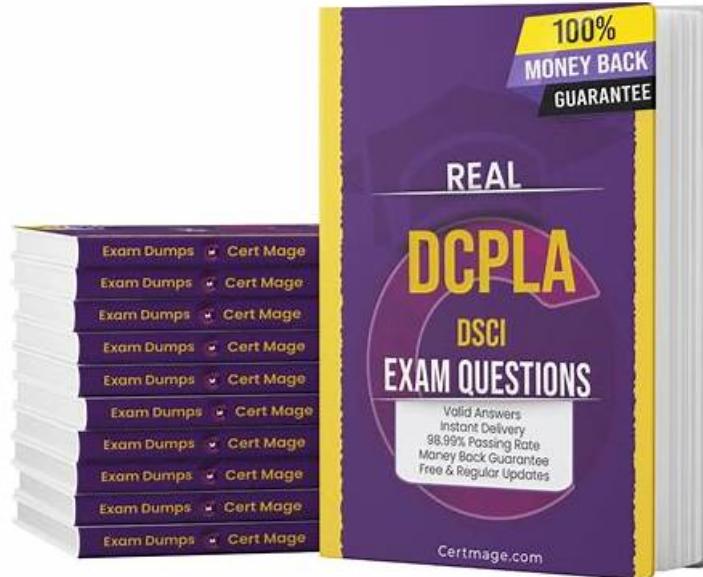


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DSCI Certified Privacy Lead Assessor DCPLA certification Sample Questions (Q53-Q58):

NEW QUESTION # 53

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. Major
- B. Both Major & Minor
- **C. Minor**
- D. None of the above

Answer: C

NEW QUESTION # 54

'Map the legal and compliance requirements to each data element that an organization is dealing with in all of its business processes, enterprise and operational functions, and client relationships.' This is an imperative of which DPF practice area?

- A. Visibility over Personal Information (VPI)
- B. Privacy Policy and Processes (PPP)
- **C. Regulatory Compliance Intelligence (RCI)**
- D. Privacy Organization and Relationship (POR)

Answer: C

Explanation:

The DPF's "Regulatory Compliance Intelligence (RCI)" practice area is focused on identifying and mapping applicable legal and compliance requirements to the specific data elements across business processes. This enables organizations to operationalize compliance obligations by linking them directly with the data they manage.

RCI helps ensure that every data flow or processing activity has a mapped legal basis and complies with jurisdictional requirements.

NEW QUESTION # 55

Which of the following are classified as Sensitive Personal Data or Information under Section 43A of ITAA, 2008? (Choose all that apply.)

- A. Password
- B. Caste and religious beliefs
- **C. Financial information**
- **D. Biometric information**
- **E. Medical records and history**
- **F. Sexual orientation**

Answer: C,D,E,F

NEW QUESTION # 56

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IUA and PAT

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 as 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.

(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.

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

Answer:

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 # 57

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

Answer: B

Explanation:

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.

NEW QUESTION # 58

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