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The digital age has brought about a vast amount of personal data, which is collected, stored, and transmitted by organizations, big and small. With the rise in cyberattacks and data breaches, privacy concerns have become a critical issue for organizations. Consequently, there is an increasing demand for professionals who understand privacy regulations and can assess an organization's compliance with these regulations. The DSCI DCPLA (DSCI Certified Privacy Lead Assessor) certification is one such program that equips professionals to assess privacy programs' effectiveness and compliance with privacy regulations.

DSCI Certified Privacy Lead Assessor DCPLA certification Sample Questions (Q99-Q104):

NEW OUESTION #99

Categorise the following statement:

"For an identified data leakage scenario, security team is struggling to configure rules."

- A. Enforcement
- B. Visibility
- C. Capability
- D. Demonstration

Answer: C

Explanation:

The statement reflects an organization's difficulty in operationalizing privacy safeguards in response to a known threat scenario. According to the DSCI Assessment Framework for Privacy (DAF-P), "Capability" refers to an organization's ability to implement and maintain technical, procedural, and administrative controls effectively.

A struggling security team in configuring rules for a known leakage scenario indicates a gap in technical expertise or resources, which directly correlates with a lack of "Capability." This category assesses how prepared an organization is in deploying privacy controls, managing incidents, and aligning security technologies with privacy requirements.

Thus, the challenge in configuring protective rules is best categorized under "Capability" as it denotes a functional inadequacy in handling privacy-related incidents.

NEW QUESTION # 100

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

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

Answer: C

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 # 101

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MIM

The company has a well-defined and tested Information security monitoring and incident management process in place. The process has been in place since last 10 years and has matured significantly over a period of time. There is a Security Operations Centre (SOC) to detect security incidents based on well-defined business rules.

The security incident management is based on ISO 27001 and defines incident types, alert levels, roles and responsibilities, escalation matrix, among others. The consultants advised company to realign the existing monitoring and incident management to cater to privacy requirements. The company consultants sought help of external privacy expert in this regard.

(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.

If you were the privacy expert advising the company, what steps would you suggest to realign the existing security monitoring and incident management to address privacy requirements especially those specific to client relationships? (250 to 500 words)

Answer:

Explanation:

See the answer in explanation below.

Explanation:

As an external privacy expert, the first step I would suggest for XYZ company is to conduct a detailed assessment of their existing security monitoring and incident management processes. This should include an analysis of how data is collected, stored, and accessed; what kind of policies are currently in place; and any other relevant security measures. It should also identify areas where additional process or technical changes may be required to meet privacy requirements.

Once the initial assessment has been completed, I would recommend that XYZ take steps to ensure that its processes align with applicable laws and regulations regarding data protection, such as EU GDPR. For example, they should update their policies around data collection and storage so that they comply with GDPR's requirements on consent and purpose limitation. Additionally, XYZ should ensure that their systems are secure and only authorized personnel can access the data.

Also I would suggest that XYZ develop a comprehensive incident response plan, indicating how they will address any data breaches or other privacy incidents. The plan should include steps for notification to affected individuals or organizations, containment of the incident, investigations into its cause and scope, and remediation efforts to prevent similar incidents in the future.

Lastly I would recommend that XYZ review their client contracts to ensure that they clearly describe the company's commitments regarding data protection and security measures. This could include GDPR- compliant language on consent forms as well as clauses committing to regularly audit and update processes as necessary. These contractual terms will help protect both XYZ and their clients in the event of a privacy breach.

In conclusion, implementing these steps will help XYZ establish an effective privacy program that meets all applicable legal requirements, protects their clients' data, and provides them with a competitive edge in the market. Additionally, it will ensure that they remain compliant and have appropriate measures in place to address any potential issues. By taking these proactive measures now, XYZ can ensure that they continue to successfully operate in both the EU and US markets while protecting the privacy of its customers.

NEW QUESTION # 102

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RCI and PCM

In April 2011, the rules were issued under Section 43A of the IT Act by the Government of India and the 'body corporates' were required to comply with these rules. The Corporate legal team tried to understand and interpret the rules but struggled to understand its applicability esp. to client relationships and business functions. So, the company hired an IT Act legal

struggled to understand its applicability esp. to client relationships and business functions. So, the company hired an IT Act legal expert to advise them on the Section 43A rules.

To start with, the company identified the PI dealt with by business functions as part of the earlier visibility exercise, but it wanted to reassure itself. Therefore, a specific everyise was conducted to revisit sensitive personal information, dealt by business functions. It

reassure itself. Therefore, a specific exercise was conducted to revisit 'sensitive personal information' dealt by business functions. It was realized that the company collects lot of SPI of its employees and therefore 'reasonable security practices' need to be adhered to by the functions that deal with SPI. It was also ascertained that many of this SPI is being dealt by third parties, some of which are also located outside India. To meet the requirements of the rules, the company reviewed all the contracts and inserted a clause - 'the service provider shall implement reasonable security practices and procedures as per the IT (Amendment) Act, 2008'. Some of the large service providers were ISO 27001 certified and they claimed that they fulfill the requirements of 'reasonable security practices'. However, some SME service providers did not understand what would 'reasonable security practices' imply and requested the company to clarify, which referred them to Rule 8 of the Section 43A. Some small scale service providers expressed their unwillingness to get ISO certified, given the costs involved.

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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.

Did the company take sufficient steps to protect SPI dealt by its service providers and ensure that it complies with the regulatory requirements? Was referring to 'reasonable security practices' sufficient in the contracts or the company should have also considered some other measures for privacy protection as well? (250 to 500 words)

Answer:

Explanation:

See the answer in explanation below.

Explanation:

The consulting arm of XYZ developed a comprehensive privacy program in line with the company's goal to leverage its existing technology infrastructure, resources and capabilities for protecting data. The program had three parts - awareness and training, policy development and implementation. On the awareness front, extensive training was conducted for employees on various aspects of privacy including GDPR compliance.

This was followed by the development and rollout of an enterprise-wide privacy policy which clearly defined the various steps to be taken to protect sensitive personal information (SPI) such as encryption, access controls etc. After this, customer contracts were reviewed for appropriate protection clauses and service providers were made to sign 'reasonable security practices' clauses in their contractual obligations as specified in EU GDPR.

At first glance, it seemed that XYZ had taken adequate steps to protect SPI dealt by its service providers and ensure that it complies with the regulatory requirements. However, on careful scrutiny, there were some lacunae in the program. For instance, as per EU GDPR, personal data must be pseudonymized or encrypted prior to transfer from one entity to another. In this case, though encryption was mentioned in the policy documents but there were no specific measures given for ensuring proper encryption of data before any transfer. Similarly, 'reasonable security practices' clause was included in customer contracts but there was no mention of any tools like firewalls or other means of protecting sensitive information which could have further strengthened the privacy protection efforts made by the company.

Thus, it is clear that XYZ did made some efforts to comply with the EU GDPR but in order to ensure full compliance, more specific measures should have been taken and all contractual obligations must be such that they clearly define the security and privacy controls that need to be put in place between customer/client and service provider. This would further give customers greater assurance of privacy protection from XYZ's services. Going forward, XYZ can consider investing in more advanced technologies like biometrics authentication etc for maximum security of data. Furthermore, the company should also ensure periodic reviews of its policy documents and contracts so as to ensure better protection of sensitive personal information.

Overall, though XYZ took some reasonable steps to protect SPI of its customers, it should have done more by introducing advanced security measures and including stringent contractual obligations for service providers.

This would have enabled the company to achieve full compliance with EU GDPR and ensure greater security of customer's personal data.

An organization is always a data controller for its	
• A. Client	
B. None of the above	
• C. Employees	
D. Supervisory authority	
Answer: C	
Explanation: Under the DSCI Privacy Framework and consistent with global definitions (including GDPR and APEC), a "Data Controller" is the entity that determines the purposes and means of processing personal data. For its own employees, organization inherently controls how their personal data is collected, used, and stored - making it the data controller by defa is not necessarily the case for clients or supervisory authorities, whose data processing may be governed by different contrallegal terms.	ult. This
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