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## DSCI Certified Privacy Lead Assessor DCPLA certification Sample Questions (Q80-Q85):

### NEW QUESTION # 80

1. Single out the incorrect statement(s) from among the following:
2. Terms 'Identified individual' and 'identifiable individual' are interchangeable Anonymised Data is personal data
3. Personal Data is based on uniqueness

- A. ii
- B. i
- C. iii
- D. i&ii

**Answer: A**

### NEW QUESTION # 81

What is the maximum penalty amount for Data Principals for breach of their duties under Section-15 of the Digital Personal Data Protection Act, 2023?

- A. Upto 50 crore rupees
- B. Upto 200 crore rupees
- C. Upto 250 crore rupees
- **D. Upto 10 thousand rupees**

**Answer: D**

Explanation:

Section 15 of the Digital Personal Data Protection Act, 2023 outlines the duties of Data Principals. For breaches of these duties, the Act prescribes a financial penalty not exceeding ten thousand rupees. This provision ensures that Data Principals are accountable for misusing or violating data protection norms while balancing their responsibilities under the Act.

### NEW QUESTION # 82

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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 and 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.

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)

**Answer:**

Explanation:

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.

**NEW QUESTION # 83**

What are the Nine Privacy Principles as described in DSCI Privacy Framework (DPF©)?

- I) Use Limitation
- II) Accountability
- III) Data Quality
- IV) Notice
- V) Preventing Harm
- VI) ChoiceandConsent
- VII) Access and Correction
- VIII) Data Minimization
- IX) Openness
- X) Disclosure to Third Parties
- XI) Right to be Forgotten
- XII) Collection limitation
- XIII) Security

- A. I, II, IV, V, VI, VII, IX, X, XII, XIII
- **B. I, II, III, IV, V, VI, VII, VIII, IX**
- C. I, II, III, IV, V, VI, VII, VIII, XII
- D. I, II, III, IV, VII, VIII, IX, X, XI

**Answer: B**

Explanation:

As per the official DSCI Privacy Framework (DPF©), the framework is built upon a set of nine core Privacy Principles that are foundational to establishing and assessing privacy initiatives in an organization. These principles are as follows:

- \* Notice- Individuals must be informed about the collection and use of their personal data.
- \* ChoiceandConsent- The data subject's choice must be respected through consent mechanisms.
- \* Collection Limitation- Personal data must be collected only for identified purposes.
- \* Use Limitation- Data should be used only for the purposes specified at the time of collection.

- \* Data Quality- Ensuring data is accurate, complete, and kept up-to-date.
- \* AccessandCorrection- Data subjects must have access to their data and the ability to correct it.
- \* Security- Adequate protection of personal data against unauthorized access and breaches.
- \* Openness- Organizations must be transparent about their privacy practices.
- \* Accountability- The entity collecting and processing data is responsible for complying with the principles.

These match exactly with the components listed in option A: I (Use Limitation), II (Accountability), III (Data Quality), IV (Notice), V (Preventing Harm-not explicitly named in DPF, hence not part of the standard nine), VI (ChoiceandConsent), VII (Access and Correction), VIII (Data Minimization), IX (Openness).

Hence, the correct nine principles according to DPF© are exactly as listed in option A.

#### NEW QUESTION # 84

Which of the following is not an objective of VPI?

- A. To enable identification of processes, functions and relationships handling personal information
- B. Assess the current state of data spread and transactions of the organization to map this against its privacy objectives
- C. None of the above
- D. Enable an organization to map its data operations and categorization of PI

**Answer: C**

Explanation:

All the listed options (A, B, and C) are legitimate objectives of the "Visibility over Personal Information (VPI)" practice area. The VPI layer emphasizes:

- \* Comprehensive inventorying and mapping of personal data across systems
- \* Aligning data operations with privacy risks and business goals
- \* Categorizing data to manage consent, retention, and sharing

Therefore, none of these options are incorrect or outside the scope of VPI.

#### NEW QUESTION # 85

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