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DSCI Certified Privacy Lead Assessor DCPLA certification Sample Questions (Q88-Q93):

NEW QUESTION # 88

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 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.

What are key issues in the policy design process? (upto 250 words)

Answer:

Explanation:

See the answer in explanation below.

Explanation:

The PI policy (or for that matter any policy) needs to be purpose driven, clear, concise, easily accessible to be effective. Ideally the PI policy controls needs to be implemented as a part of the overall operations process so that the implementation of this policy is automatic. In this case, the issues with the policy design process was

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1. the policy was a generic and common policy for all the business functions/unit. Such policies become lengthy, complex and deters the policy subjects from adopting it.
2. All the client relationships and business functions are unique. They differ in their purpose, objectives, process and hence also in the type of the information then collect and process. The policy should be easy and customized for each department.
3. The policy is published on the intranet portal. There is no guarantee that the policy is read and consumed by all desired stakeholder. As opposed to this, this policy matter should be made relevant and customized for the stakeholders and be PUSHED to them against them PULLING it at their discretion.
4. The roles and responsibilities, accountability and penalty for each stakeholders should be defined clearly so there is no confusion in the adherence to the policy.
5. The training workshop was generic and was short. It was not completed in time. the training program should be customized and contextual to the department people that are being trained. the program should be conducted in a very professional environment and method.
6. Since the policy, purpose, roles and responsibilities were not clear, the training program did not go well.

NEW QUESTION # 89

With respect to privacy monitoring and incident management process, which of the following should be a part of a standard incident handling process?

- I) Incident identification and notification
- II) Investigation and remediation
- III) Root cause analysis
- IV) User awareness training on how to report incidents

- A. III and IV
- B. I, II and III
- C. I and II
- **D. All of the Above**

Answer: D

Explanation:

DSCI Privacy Framework recommends a holistic approach to incident management which includes:

- * Identification and timely notification of incidents (I)
- * Thorough investigation and effective remediation measures (II)
- * Conducting root cause analysis to prevent recurrence (III)
- * Educating users on how to recognize and report incidents (IV)

Each of these components plays a critical role in reducing risk exposure and ensuring continual improvement of the privacy program.

NEW QUESTION # 90

What is a Data Subject? (Choose all that apply.)

- **A. An individual whose data/information is processed**
- **B. An individual who provides his/her data/information for availing any service**
- C. An individual who processes the data/information of individuals for providing necessary services
- D. An individual who collects data from illegitimate sources
- E. A company providing PI of its employees for processing

Answer: A,B

NEW QUESTION # 91

The method of personal data usage in which the users must explicitly decide not to participate.

- A. Data mining
- B. Data matching
- C. Opt-In
- **D. Opt-out**

Answer: D

Explanation:

The term "Opt-out" refers to a consent model in which individuals are automatically included in a data processing activity or program unless they explicitly indicate their desire not to participate.

Under the DSCI Privacy Framework, "Opt-out" is contrasted with "Opt-in," where explicit affirmative consent is required before processing.

Opt-out is often implemented through mechanisms like pre-checked boxes or default settings, which the user can change. This is particularly common in direct marketing scenarios or cookies for analytics. The DAF-PC considers whether such consent mechanisms align with fairness and transparency principles.

NEW QUESTION # 92

_____ is used to identify and reduce privacy risks by analyzing what is processed by the entity and the policies in place to protect the data.

- A. Minimization
- **B. Privacy Impact Assessment**
- C. Anonymization
- D. Threat Hunting

Answer: B

NEW QUESTION # 93

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