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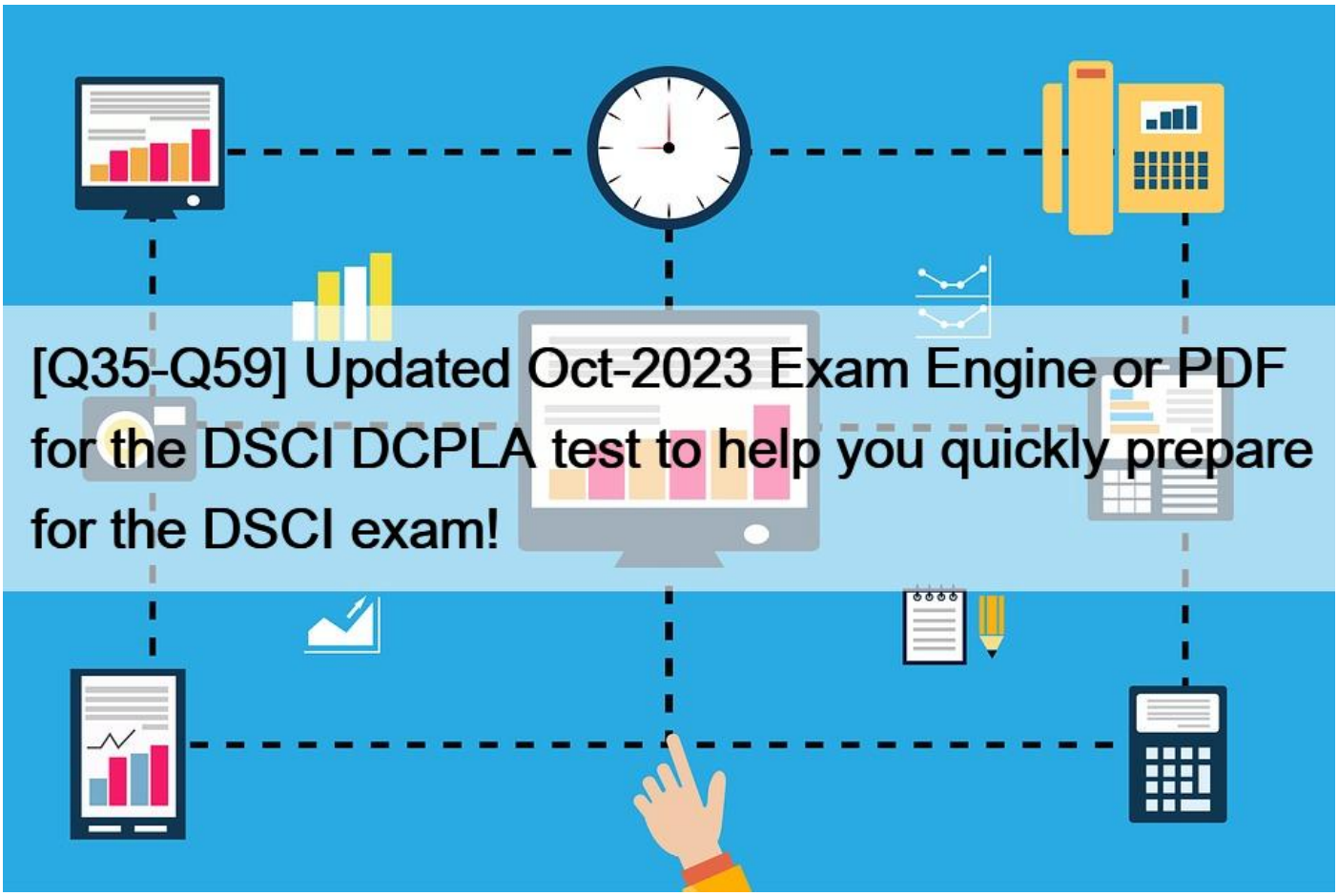

Updated Oct-2023 Test Engine or PDF for the DSCI DCPLA test to help you quickly prepare for the DSCI exam! Full DCPLA Practice Test and 70 unique questions with explanations waiting just for you, get it now! QUESTION 35

The assessor organization can issue the DSCI certification to the assessee organization if it is satisfied with the assessment outcome.
* True
* False

QUESTION 36

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RCI and PCM

Given its global operations, the company is exposed to multiple regulations (privacy related) across the globe and needs to comply mostly through contracts for client relationships and directly for business functions. The corporate legal team is responsible for managing the contracts and understanding, interpreting and translating the legal requirements. There is no formal tracking of regulations done. The knowledge about regulations mainly comes through interaction with the client team. In most of the contracts,

the clients have simply referred to the applicable legislations without going any further in terms of their applicability and impact on the company. Since business expansion is the priority, the contracts have been signed by the company without fully understanding their applicability and impact. Incidentally, when the privacy initiatives were being rolled out, a major data breach occurred at one of the healthcare clients located in the US. The US state data protection legislation required the client to notify the data breach. During investigations, it emerged that the data breach happened because of some vulnerability in the system owned by the client but managed by the company and the breach actually happened 5 months back and came to notice now. The system was used to maintain medical records of the patients. This vulnerability had been earlier identified by a third party vulnerability assessment of the system and the closure of vulnerability was assigned to the company. The company had made the requisite changes and informed the client. The client, however, was of the view that the changes were actually not made by the company and they therefore violated the terms of contract which stated that – “the company shall deploy appropriate organizational and technology measures for protection of personal information in compliance with the XX state data protection legislation.” The company could not produce necessary evidences to prove that the configuration changes were actually made by it (including when these were made).

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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.

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Why do you think the company failed to defend itself against client accusations? (250 to 500 words)
The company failed to defend itself against accusations by its clients most likely due to the fact that it did not have enough expertise in privacy and data protection. The company’s privacy program was designed and implemented by an internal consulting arm which had limited expertise in the domain, causing the program to be inadequate for the purpose of defending itself against accusations. Moreover, since the project was driven by CIO’s office, there may have been a lack of coordination between different functions like Corporate Information Security and Legal functions which could also have contributed to the failure.

It is possible that there were gaps in the organizational measures deployed by XYZ as well as gaps in technology measures. For example, it is possible that although appropriate organizational measures were put in place, the technology measures were inadequate for protecting the sensitive data of its clients. In addition, it is possible that the company did not rigorously monitor compliance with these organizational and technological measures, thereby making it vulnerable to accusations by its clients.

It is also likely that XYZ was unable to fully comply with applicable privacy laws and regulations in the EU due to lack of awareness about their requirements as well as insufficient resources allocated for adapting to them. The EU GDPR requires companies to implement appropriate technical and organizational measures for the protection of personal data which could have been a challenge for XYZ given its limited expertise in this domain. Furthermore, even though it may have had some understanding of the legal requirements, there may have been difficulty in properly implementing them, which could have led to the accusations by its clients.

Finally, it is possible that XYZ failed to defend itself against client accusations because of a lack of communication between its different departments and functions. The company may not have had a clear understanding of the requirements and risks associated with data protection and privacy compliance which could have caused miscommunication among various stakeholders leading to inadequate responses when it was challenged by its clients.

Overall this case study demonstrates the importance of properly designing and implementing an effective privacy program in order to protect sensitive data from unauthorized access or misuse. Companies should ensure that they have adequate expertise in data protection as well as sufficient resources for adapting to changing regulatory requirements in order to avoid potential legal issues arising from client accusations.

Effective communication and coordination across different departments and functions is also essential for successful data protection compliance.

It is recommended that companies invest in an ongoing training program to ensure that employees understand the importance of privacy, have an awareness of the legal requirements, and are able to properly implement security measures to protect sensitive data. Organizations should also consider implementing automated tools and technologies such as encryption, access control systems, identity management solutions, etc., which can help them better defend themselves against potential client accusations.

QUESTION 37

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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.

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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)
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.

QUESTION 38

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) Choice & Consent

VII) Access and Correction

VIII) Data Minimization

IX) Openness

X) Disclosure to Third Parties

XI) Right to be Forgotten

XII) Collection limitation

XIII) Security

* I, II, III, IV, V, VI, VII, VIII, IX
* I, II, IV, V, VI, VII, IX, X, XII, XIII
* I, II, III, IV, V, VI, VII, VIII, XII
* I, II, III, IV, VII, VIII, IX, X, XI

QUESTION 39

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

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

QUESTION 40

The concept of data adequacy is based on the principle of _____.

* Adequate compliance
* Dissimilarity of legislations
* Essential equivalence

* Essential assessment

QUESTION 41

Categorize the following statements as: Visibility/ Capability /Enforcement /Demonstration Problems

“The network is unable to restrict unwanted external connections carrying sensitive information.”
* Visibility
* Capability
* Enforcement
* Demonstration

QUESTION 42

Which of the following is outside the scope of an organization’s privacy incident management plan?
* Detection of leakage of personal information
* Defers data access rules for business users
* Communication of privacy incidents
* Remediation of incidents

QUESTION 43

Your district council releases an interactive of map of orange trees in the district which shows that the locality in which your house is located has the highest concentration of orange trees. Does the council map contain your personal information?
* Yes – your ownership of the property is a matter of public record.
* No – Orange trees are not a person and so it can’t have personal information.
* It depends – on the context of other information associated with the map.
* None of the above.

QUESTION 44

Which of the following could be considered as triggers for updating privacy policy? (Choose all that apply.)
* Regulatory changes
* Privacy breach
* Change in service provider for an established business process
* Recruitment of more employees

QUESTION 45

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What should be the learning for the company going forward? What should the consultants suggest? (250 to 500 words)
The consultants should suggest a comprehensive and integrated privacy program for the company which addresses the current regulatory requirements while being proactive in anticipating any changes to these regulations. The program should be effective, flexible, cost-efficient and easy to understand & implement.

To begin with, the program should involve an assessment of all existing processes and procedures that are related to personal data processing in order to identify potential areas of risk. The potential risks along with recommended mitigating controls should then be documented in a Privacy Impact Assessment (PIA) report.

This will enable the organization to assess its compliance level against applicable regulations.

It is also important for XYZ to have strong Data Governance policies & procedures along with appropriate organizational structures and accountability mechanisms in place. This will include a Data Privacy Officer (DPO) who is responsible for overseeing the compliance program and being the point of contact for data protection supervisory authorities. The DPO should be part of the management team and report to the CIO’s office as well as senior-level executives.

A consultant should also recommend data minimization, pseudonymization, encryption, and other security measures to protect personal information. In addition, they can recommend regular privacy awareness training sessions for employees, so that they are up-to-date on changes in regulations and understand how their role impacts data privacy and security. Lastly, all systems & processes should be monitored & audited to ensure compliance with relevant regulations.

As a result, consultants should provide clients in the EU and US with an integrated & comprehensive privacy program that provides the necessary assurances and protects sensitive data from unauthorized access or misuse. By leveraging outsourcing opportunities in the healthcare sector in the US, XYZ could potentially gain competitive advantage.

QUESTION 46

With respect to privacy implementation, organizations should strive for which of the following:
* Meaningful compliance
* Demonstrable accountability
* Checklist based exercise
* None of the above

QUESTION 47

Which of the following factors is least likely to be considered while implementing or augmenting data security solution for privacy protection?
* Security controls deployment at the database level
* Information security infrastructure up-gradation in the organization
* Classification of data type and its usage by various functions in the organization
* Training and awareness program for third party organizations

QUESTION 48

Certification once granted, will be valid for period of _____ years subject to surveillance assessments.
* 4
* 5
* 3
* 1

QUESTION 49

Its mandatory for the assessee to provide the pre-requisites to the assessor organization before commencement of the first phase of assessment.
* True
* False

QUESTION 50

Which of the following is not in line with the modem definition of Consent?

* Consent is taken by clear and affirmative action
* Consenting individual should have the ability to withdraw consent
* Consent should be bundled in nature
* Purpose of processing should be informed to the individual before consenting

QUESTION 51

Which of the following are key contributors that would enhance the complexity in implementing security measures for protection of personal information? (Choose all that apply.)
* Data collection through multiple modes and channels
* Evolution of nimble and flexible business processes affecting access management
* Regulatory requirements to issue privacy notice and data breach notification in specified format
* None of the above

QUESTION 52

From the following list, identify the technology aspects that are specially designed for upholding privacy:

I) Data minimization

II) Intrusion prevention system

III) Data scrambling

IV) Data loss prevention

V) Data portability

VI) Data obfuscation

VII) Data encryption

VIII) Data mirroring
* Only I, III, V, VII and VIII
* Only I, II, III, VII and VIII
* Only I, III, IV, VI and VII
* Only II, V, VI, VII and VIII

QUESTION 53

Which of the following does the ‘Privacy Strategy & Processes’ layer in the DPF help accomplish? (Choose all that apply.)
* Visibility over Personal Information
* Privacy Policy and Processes
* Regulatory Compliance Intelligence
* Information Usage and Access
* Personal Information Security

QUESTION 54

Can a DSCI Certified Lead Assessor for Privacy, not currently an employee of a DSCI Accredited Organization, conduct external assessment leading to DSCI Privacy certification?
* True
* False

QUESTION 55

‘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 an imperative of which DPF practice area?
* Visibility over Personal Information (VPI)
* Privacy Organization and Relationship (POR)
* Regulatory Compliance Intelligence (RCI)
* Privacy Policy and Processes (PPP)

QUESTION 56

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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.

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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)
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.

QUESTION 57

An entity shall retain personal data only as long as may be reasonably necessary to satisfy the purpose for which it is processed; or with respect to an established retention period. This privacy principle is known as?
* Collection Limitation

* Use Limitation
* Security safeguards
* Storage Limitation

QUESTION 58

FILL BLANK

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 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.

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What should the company do to limit data collection and usage and at the same time ensure that such kinds of incidents don’t reoccur? (250 to 500 words)
XYZ should strive to create a comprehensive privacy policy that addresses all aspects of data collection, usage and storage. This will both protect the company from legal liabilities as well as create an environment of trust between customers and the organization. It should also ensure that proper security controls are in place for both on-premise systems as well as cloud services. The policy should outline details regarding access privileges and procedures for handling sensitive personal information including photographs.

Further, XYZ should conduct regular training sessions with employees, especially those in IT support functions, to enhance their knowledge about the company’s privacy policies and procedures. An employee code of conduct outlining restrictions on the misuse of data must be implemented and communicated clearly to all stakeholders involved in data processing activities. The company should also implement technical measures such as encryption and pseudonymisation of data, which will ensure that the data is only accessible by authorized personnel with proper privileges.

In addition to this, XYZ should also create a framework for breach notification that outlines the steps to be taken in case of any unauthorized access or disclosure of information. The policy should set out procedures for assessing incidents and for informing the relevant authorities as well as affected individuals within a specified timeframe. Finally, XYZ should develop an independent monitoring mechanism to ensure compliance with its privacy policies and procedures. This may include third-party audits, regular evaluation of existing policies, and periodic reviews of employee performance.

By investing in privacy and security controls at both procedural and technical levels, XYZ can ensure that it is able to keep pace with the ever-evolving privacy landscape and provide its customers with the assurance they need.

This will also help the company meet any new regulatory requirements as well as ensure that similar incidents don’t reoccur in the future. In this way, XYZ will be able to successfully access and tap into potential markets while reducing legal liabilities associated with data misuse.

The bottom line is that proper investment in privacy and security will yield long-term dividends by enhancing customer trust in the organization. By implementing a comprehensive framework of policies, procedures and technical measures, XYZ can protect personal information from unauthorized access or disclosure, thereby providing increased assurance to customers that their data is safe and secure.

In this way, the company will be better positioned to remain competitive in an increasingly competitive landscape.

QUESTION 59

Which of the following statement is incorrect?
* Privacy policy may be derived from outcomes of privacy impact assessment
* Misuse of personal information available in public domain may be construed as a privacy violation
* A privacy policy once framed cannot be changed before the specified review period
* None of the Above

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