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QUESTION 1

There are several privacy incidents reported in an organization. The organization plans to analyze and learn from these incidents. Which privacy practice will the organization have to implement for the same?

- A. Information usage and access
- B. Privacy contract management
- C. Privacy awareness and training
- D. Privacy monitoring and incident management

Correct Answer: D

QUESTION 2

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

- A. Only I, III, V, VII and VIII
- B. Only I, II, III, VII and VIII
- C. Only I, III, IV, VI and VII
- D. Only II, V, VI, VII and VIII

Correct Answer: C

QUESTION 3

Which of the following activities form part of an organization's Visibility over Personal Information (VPI) initiative, according to DSCI Privacy Framework (DPF)?

- A. `Data processing environment` analysis of industry peers
- B. `Data processing environment` analysis of the country
- C. `Data processing environment` analysis of the organization and associated third parties
- D. `Data processing environment` analysis of the organization only

Correct Answer: C



QUESTION 4

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. Enable an organization to map its data operations and categorization of PI
- D. None of the above

Correct Answer: D

QUESTION 5

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.

Do you agree with company's decision to have single privacy policy for all the relationships and functions? Please justify your view. (250 to 500 words)

- A. See the answer in explanation below.
- B. Placeholder
- C. Placeholder
- D. Placeholder

Correct Answer: A

Yes, I agree with the company's decision to have a single privacy policy for all its relationships and functions. Having a unified privacy policy allows the organization to communicate consistently across multiple channels of communication with

customers, partners and vendors. It also ensures that all stakeholders are aware of their rights when dealing with personal data and makes it easier for them to understand their responsibilities when handling such information.

Moreover, having a standardized privacy policy helps to protect the company from potential legal repercussions due to inadequate protection of confidential data. The need for comprehensive protection is especially important in this age

where cyber-attacks are becoming increasingly frequent and sophisticated. By putting in place a consistent framework that governs how any organization handles sensitive information can help reduce the risks associated with data breaches.

By demonstrating that the company takes strong measures to protect its customers' personal information, a single privacy policy can help boost the company's reputation and build trust with customers. Compliance with a variety of regulatory

requirements is especially important for companies operating in regulated industries, such as banking and healthcare.

In addition, having a unified privacy policy allows organizations to maintain control over how their data is stored and processed. By monitoring who has access to confidential information, companies can identify any potential security

vulnerabilities before they are exploited by malicious actors.

To conclude, I support XYZ's decision to have one privacy policy for all its relationships and functions. Having a unified privacy policy can help the organization protect itself from potential legal risks, boost its reputation and maintain control

over how data is stored and used. All in all, it is an important step to ensure that customer data is always kept safe and secure.