Exam Code: DCPLA

Exam Name: DSCI Certified Privacy Lead Assessor

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Question No: 1

_____ calls for inclusion of data protection from the onset of the designing of systems.

A. Agile Model

B. Privacy by Design

C. Logical Design

D. Safeguarding Approach

Answer: B

Question No: 2

Which of the following are classified as Sensitive Personal Data or Information under Section 43A of ITAA, 2008? (Choose all that apply.)

A. Password

B. Financial information

C. Sexual orientation

D. Caste and religious beliefs

E. Biometric information

F. Medical records and history

Answer: B, C, E, F

Question No: 3

Entities should collect personal information from user that is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. This Privacy Principle is called:

A. Collection Limitation

B. Use Limitation

C. Accountability

D. Storage Limitation

Answer: A

Question No: 4

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

A. Opt-In

B. Opt-out

C. Data mining

D. Data matching

Answer: B

Question No: 5

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?

A. Collection Limitation

B. Use Limitation

C. Security safeguards

D. Storage Limitation

Answer: D

Question No: 6

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

A. I, II, III, IV, V, VI, VII, VIII, IX

B. I, II, IV, V, VI, VII, IX, X, XII, XIII

C. I, II, III, IV, V, VI, VII, VIII, XII

D. I, II, III, IV, VII, VIII, IX, X, XI

Answer: B

Question No: 7

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

A. Adequate compliance

B. Dissimilarity of legislations

C. Essential equivalence

D. Essential assessment

Answer: C

Question No: 8

What is a Data Controller?

A. Entity that collects personal data

B. Entity that stores personal data

C. Entity that determines the purpose and means for data processing

D. Entity that shares personal data with third parties

Answer: C

Question No: 9

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

A. An individual who provides his/her data/information for availing any service

B. An individual who processes the data/information of individuals for providing necessary services

C. An individual whose data/information is processed

D. A company providing PI of its employees for processing

E. An individual who collects data from illegitimate sources

Answer: A, C

Question No: 10

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?

A. Yes – your ownership of the property is a matter of public record.

B. No – Orange trees are not a person and so it can't have personal information.

C. It depends – on the context of other information associated with the map.

D. None of the above.

Answer: C

Question No: 11

In the landmark case _____ the Honourable Supreme Court of India reaffirmed the status of Right to Privacy as a Fundamental Right under Part III of the constitution.

A. M. P. Sharma and others vs. Satish Chandra, District Magistrate, Delhi, and others

B. Maneka Gandhi vs. Union of India

C. Justice K. S. Puttaswamy (Retd.) and Anr. vs. Union of India And Ors

D. Olga Tellis vs. Bombay Municipal Corporation

Answer: C

Question No: 12

Which of the following wasn't prescribed as a privacy principle under the OECD Privacy Guidelines, 1980?

A. Openness

B. Security Safeguard

C. Data Minimization

D. Purpose Specification

Answer: A

Question No: 13

Which of the following provisions of Information Technology (Amendment) Act, 2008 deal with protection of PI or SPDI of Individuals?

A. Section 43A & Section 72A

B. Section 43A

C. Section 65

D. Section 43A & Section 65

Answer: B

Question No: 14

How are privacy and data protection related to each other?

A. Data protection is a subset of privacy.

B. Privacy is a subset of data protection.

C. The terms ‘privacy’ and ‘data protection’ are interchangeable.

D. They are unrelated.

Answer: A

Question No: 15

Arrange the following techniques in decreasing order of the risk of re-identification:

I) Pseudonymization

II) De-identification

III) Anonymization

A. I, II

B. III, II, I

C. II, III, I

D. All have equal risk of re-identification

Answer: C

Question No: 16

Which among the following would not be characteristic of a good privacy notice?

A. Easy to understand

B. Clear and concise

C. Comprehensive – explaining all the possible scenarios and processing details making the notice lengthy

D. Multi-lingual

Answer: C

Question No: 17

Which of the following mechanisms can be used to transfer personal data outside of a country?

A. Binding corporate rules

B. Adequacy decision

C. Standard contractual clauses

D. All of the above

Answer: D

Question No: 18

_____ 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. Privacy Impact Assessment

B. Anonymization

C. Threat Hunting

D. Minimization

Answer: A

Question No: 19

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

A. Consent is taken by clear and affirmative action

B. Consenting individual should have the ability to withdraw consent

C. Consent should be bundled in nature

D. Purpose of processing should be informed to the individual before consenting

Answer: C

Question No: 20

Which of the following best describes ‘Processing’?

A. Processing is collection and use of personal data

B. Processing is storage and structuring personal data

C. Processing is recording and destruction of personal data

D. Processing is a blanket term used for the wide range of operations performed on personal data

Answer: B

Question No: 21

Section 43A of the Information Technology (Amendment) Act, 2008 holds_____ accountable for having reasonable security practices and procedures in place to protection sensitive personal data.

A. Government

B. Body corporates

C. Government and body corporates alike

D. None of the above

Answer: C

Question No: 22

“Data which cannot be attributed to a particular data subject without use of additional information.” Which of the following best describes the above statement?

A. Anonymized Data

B. Metadata

C. Pseudonymized Data

D. None of the above

Answer: C

Question No: 23

With respect to privacy implementation, organizations should strive for which of the following:

A. Meaningful compliance

B. Demonstrable accountability

C. Checklist based exercise

D. None of the above

Answer: A

Question No: 24

An organization is always a data controller for its _____.

A. Employees

B. Client

C. Supervisory authority

D. None of the above

Answer: A

Question No: 25

What is the maximum compensation that can be imposed on an organization for negligence in implementing reasonable security practices as defined in Section 43A of ITAA, 2008?

A. Uncapped compensation

B. 5 crores

C. 15 crores or 4% of the global turnover

D. 5 lakhs

Answer: C

Question No: 26

Which of the following does the 'Privacy Strategy & Processes' layer in the DPF help accomplish?

(Choose all that apply.)

A. Visibility over Personal Information

B. Privacy Policy and Processes

C. Regulatory Compliance Intelligence

D. Information Usage and Access

E. Personal Information Security

Answer: A, B, D, E

Question No: 27

Following aspects can serve as inputs to a privacy organization for ensuring privacy protection:

I) Privacy related incidents detected/reported

II) Contractual obligations

III) Organization's exposure to personal information

IV) Regulatory requirements

A. I, II and III

B. II and IV

C. I, II, III and IV

D. None of the above, as privacy and compliance protection mechanisms are evolved based only on organization's privacy policies and procedures

Answer: C

Question No: 28

'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?

A. Visibility over Personal Information (VPI)

B. Privacy Organization and Relationship (POR)

C. Regulatory Compliance Intelligence (RCI)

D. Privacy Policy and Processes (PPP)

Answer: D

Question No: 29

XYZ bank has recently decided to start offering online banking services. For doing so, the bank has outsourced its IT operations and processes to various third parties. Acknowledging privacy concerns, bank has decided to implement a privacy program. Assuming you have been tasked to deploy this framework for the bank, which of the following would most likely be your first step?

A. Create an inventory of business processes that deal with personal information and identify the associated data element

B. Ensure that bank is equipped to test the relevance of each legal and compliance requirement in its environment

C. Assign privacy roles and responsibilities for process owners

D. None of the above

Answer: A

Question No: 30

Which of the following statement is incorrect?

A. Privacy policy may be derived from outcomes of privacy impact assessment

B. Misuse of personal information available in public domain may be construed as a privacy violation

C. A privacy policy once framed cannot be changed before the specified review period

D. None of the Above

Answer: C

Question No: 31

Which of the following measures can an organization implement to establish regulatory compliance intelligence? (Choose all that apply.)

A. Establish a process that keeps a track of applicable legal and regulatory changes

B. Identify the liabilities imposed by the regulations with respect to specific data elements

C. Ensure that a mechanism exists for quick and effective provisioning, de-provisioning and authorization of access to information or systems which are exposed to data

D. Ensure that knowledge with respect to legal and regulatory compliances is managed effectively

Answer: A, B

Question No: 32

Which of the following statements is true with respect to organization's privacy training and awareness program?

A. It should define roles and responsibilities of personnel in privacy function

B. It should cover employees of service provider dealing with personal information

C. It should necessarily cover officials from Law Enforcement Agencies that request lawful access to personal information

D. None of the above

Answer: A

Question No: 33

As a privacy assessor, what would most likely be the first artefact you would ask for while assessing an organization which claims that it has implemented a privacy program?

A. Privacy risk management framework

B. Records of privacy specific training imparted to the employees handling personal information

C. Personal information management policy

D. Records of deployed privacy notices and statements

Answer: A

Question No: 34

Which of the following could be considered as triggers for updating privacy policy? (Choose all that apply.)

A. Regulatory changes

B. Privacy breach

C. Change in service provider for an established business process

D. Recruitment of more employees

Answer: A, B

Question No: 35

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. I and II

B. III and IV

C. I, II and III

D. All of the Above

Answer: D

Question No: 36

Create an inventory of the specific contractual terms that explicitly mention the data protection requirements. This an imperative of which DPF practice area?

A. Visibility over Personal Information (VPI)

B. Information Usage and Access (IUA)

C. Privacy Contract Management (PCM)

D. Regulatory Compliance Intelligence (RCI)

Answer: C

Question No: 37

Which of the following is not an objective of POR?

A. Create an inventory of business processes, enterprise and operational functions, client relationships that deal with personal information

B. Identify all the activities, functions and operations that can be attributed to the privacy initiatives of an organization

C. Evaluate the role of corporate function in legal compliance management, its relations with IT, and security functions. Evaluate the role of legal function in compliance matters

D. Establish a privacy function to address the activities, functions and operations that are required to manage the privacy initiatives

Answer: C

Question No: 38

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

Answer: C

Question No: 39

Privacy enhancing tools aim to allow users to take one or more of the following actions related to their personal data that is sent to, and used by online service providers, merchants or other users:

I) Increase control over their personal data

II) Choose whether to use services anonymously or not

III) Obtain informed consent about sharing their personal data

IV) Opt-out of behavioral advertising or any other use of data

A. Only I

B. Only I and II

C. I, II, III and IV

D. Only II

Answer: C

Question No: 40

As a privacy lead assessor assessing the company for DSCI's privacy certification, you are assessing the adequacy of resources and skills in the organization, to address privacy related responsibilities.

Which DSCI Privacy Framework (DPF©) practice area is relevant?

A. Visibility over Personal Information (VPI)

B. Privacy Organization and Relationship (POR)

C. Privacy Awareness and Training (PAT)

D. Information Usage and Access (IUA)

Answer: B

Question No: 41

A newly appointed Data Protection officer is reviewing the organization's existing privacy policy.

Which of the following would be the most critical factor for the review process?

A. Awareness of the business units about the privacy policy

B. Changes in the legal/regulatory regime

C. Privacy policies of industry peers

D. Foreseeable challenges in the effective implementation of the policy

Answer: B

Question No: 42

Which of the following is outside the scope of an organization's privacy incident management plan?

A. Detection of leakage of personal information

B. Defers data access rules for business users

C. Communication of privacy incidents

D. Remediation of incidents

Answer: B

Question No: 43

Which of the following parameters should ideally be addressed by a privacy program of an organization? (Choose all that apply.)

A. Privacy incident response plan and grievance handling

B. Environmental security concerns

C. Training and data classification

D. Intellectual Property (IP) protection

Answer: A, C

Question No: 44

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

Answer: D

Question No: 45

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

Answer: C

Question No: 46

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.)

A. Data collection through multiple modes and channels

B. Evolution of nimble and flexible business processes affecting access management

C. Regulatory requirements to issue privacy notice and data breach notification in specified format

D. None of the above

Answer: A, B, C

Question No: 47

_____ layer of the DSCI Privacy Framework (DPF©) ensures that adequate level of awareness exists in an organization.

A. Personal Information Security

B. Information Usage, Access, Monitoring and Training

C. Privacy Strategy and Processes

D. None of the above

Answer: B

Question No: 48

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

A. Security controls deployment at the database level

B. Information security infrastructure up-gradation in the organization

C. Classification of data type and its usage by various functions in the organization

D. Training and awareness program for third party organizations

Answer: D

Question No: 49

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

Answer: D

Question No: 50

As a newly appointed Data Protection officer of an IT company gearing up for DSCI's privacy certification, you are trying to understand what data elements are involved in each of the business process, function and if these data elements can be classified as sensitive personal information.

What is being accomplished with this effort?

A. Organization to get "Visibility" over its exposure to sensitive personal information

B. It is a part of the annual exercise per the organization's privacy policy / processes

C. Information security controls for confidential information being reviewed

D. Gathering inputs to restructure privacy function

Answer: A

Question No: 51

Categorize the following statements as: Visibility/ Capability /Enforcement /Demonstration Problems "The network is unable to restrict unwanted external connections carrying sensitive information."

A. Visibility

B. Capability

C. Enforcement

D. Demonstration

Answer: B

Question No: 52

Classify the following scenario as major or minor non-conformity.

“The organization has a very mature information security policy. Lately, the organization has realized the need to focus on protection of PI. A formal PI identification exercise was done for this purpose and a mapping of PI and security controls was done. The organization has also put in place data masking technology in certain functions where the SPI was accessed by employees of a third party.

However, the organization is yet to include PI specifically in its risk assessment exercise, incident management, testing, data classification and security architecture programs.”

A. Major

B. Minor

C. Both Major & Minor

D. None of the above

Answer: C

Question No: 53

The entire assessment process, from commencement to submission of final report to DSCI must be completed within 2 weeks.

A. True

B. False

Answer: B

Question No: 54

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

A. True

B. False

Answer: A

Question No: 55

Certification once granted, will be valid for period of _____ years subject to surveillance assessments.

A. 4

B. 5

C. 3

D. 1

Answer: C

Question No: 56

Classify the following scenario as major or minor non-conformity.

"The organization is aware of the PI dealt by it at a broad level based on the business services provided but does not have the detailed view of which business functions, processes or relationships deal with what types of PI including usage, access, transmission, storage, etc."

A. Major

B. Minor

C. Both Major & Minor

D. None of the above

Answer: A

Question No: 57

What are the two phases of DSCI Privacy Third Party Assessment?

A. Initial and Detailed

B. Primary and Secondary

C. Initial and Final

D. None of the above

Answer: C

Question No: 58

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?

A. True

B. False

Answer: A

Question No: 59

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

A. True

B. False

Answer: A

Question No: 60

Which of the following are the key factors that need to be considered for determining the applicability of the privacy principles? (Choose all that apply.)

A. The role of the organization in determining the purpose of the data collection

B. How and where the data is coming in the organization

C. Requirements stipulated by the local authorities from where the organization operating

D. Organization's commitment to the external stakeholder with respect to privacy

Answer: A, B

Question No: 61

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VPI

As a starting point, the consultants undertook a visibility exercise to understand the type of personal information (PI) being dealt with within the organization and also by third parties and the scope was to cover all the client relationships (IT services and BPM both) and functions. They met with the client relationship and business function owners to collect this dat a. The consultants did a mapping exercise to identify PI and associated attributes including whether company directly collects the PI, how it is accessed, transmitted, stored and what are the applicable regulatory and contractual requirements. Given the enormous scale of the exercise (enterprise wide), the consultant classified the PI as financial information, health related information, personally identifiable information, etc. and collected the rest of the attributes against this classification. When understanding the underlying technology environment, the consultants restricted themselves only to the technology environment that was under company's ownership and premises and did not continue the exercise for client side environment. This was done because relationship owners seemed reluctant to share such client specific details. Only in 2 relationships, were the relationship heads proactive to introduce the consultants to the clients and get the requisite information. The analysis of the environment in these 2 relationships revealed that even though lots of restrictions were imposed at the company side, the same restrictions were not available at the client side.

Many business functions were also availing services from third party service providers. Though these functions were aware of the type of PI dealt by third parties, they were not aware of the technology environment at the third parties. In one odd case, personal information of a company employee was accidentally leaked by the employee of the third party through the social networking site. The consultants relied on whatever information was provided by the functions w.r.t. third parties. After finishing the data collection, the consultant used the information to create information flow maps highlighting the flow of information across systems deployed at the company premises. This work helped them have a high level view of PI dealt by the company. The data collection exercise has been conducted only once by the consultants. The visibility exercise empowered the management to have a company-wide view of PI and how it flows across the organization. This information was coupled with the security controls / practices deployed at the relationship or function level to derive the risk posture of the PI.

(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 & 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.

Was the visibility exercise adequately carried out? What gaps did you notice? (250 to 500 words)

Answer: See the answer in explanation below.

Explanation:

The consultants appointed by XYZ to design and implement the enterprise wide privacy program conducted a visibility exercise. This exercise was meant to capture the current state of Personal Information (PI) flows within the organization, identify any gaps between existing security controls/practices and intended enterprise-wide PI practices. The visibility exercise also included mapping the legal obligations of the organization in protecting PI across different jurisdictions where its operations were spread. Though this exercise seemed adequate to start with, some gaps in terms of meeting the requirements of EU GDPR were noticed during course of implementation.

Firstly, though the visibility exercise covered all channels through which PI would flow in and out of an organization - like email accounts, websites and physical storage locations etc., it did not cover every element of PI such as Social Security numbers and financial data. Moreover, there was no comprehensive assessment on the technical feasibility and costs associated with implementing additional measures for protecting this information. This could have been done in order to ensure that any new systems or processes introduced met the technical requirements of GDPR.

Additionally, there were certain gaps in terms of external service providers who are also responsible for ensuring compliance with GDPR while processing/storing personal data on behalf of XYZ. Though XYZ had ensured that all its existing contracts contained provisions regarding compliance with legal requirements related to privacy and confidentiality, it did not carry out any due diligence exercise to ascertain whether these third-party service providers had adequate security practices in place to comply with GDPR regulations.

Lastly, the visibility exercise did not cover all the legal obligations of XYZ in terms of compliance with GDPR. For instance, it did not consider any potential liabilities arising from data breaches and the process for dealing with such eventualities. Nor was any process put in place to ensure that appropriate technical and organizational measures were taken to protect PI as required by GDPR.

Thus though the visibility exercise carried out by XYZ consultants seemed adequate at first glance, there were several gaps identified in terms of meeting EU's GDPR requirements. These gaps could have been addressed through a more comprehensive assessment and must be taken care of if XYZ has to realize its full potential in Europe. As GDPR is now firmly in place across the continent, companies cannot ignore its regulations and must take necessary action to ensure compliance.

This includes making sure that every element of PI is taken into consideration while designing an enterprise-wide privacy program, due diligence with regards to external service providers who process/store data on behalf of XYZ, and establishing a comprehensive legal framework for dealing with any potential liabilities arising from data breaches. In short, if XYZ does not address these gaps effectively, it may find itself in a vulnerable position in terms of protecting personal information as required by applicable laws. It will also be at risk of facing significant fines or other penalties.

Question No: 62

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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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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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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)

Answer: See the answer in explanation below.

Explanation:

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 thirdparty 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 No: 63

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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 role can training and awareness play here? (250 to 500 words)

Answer: See the answer in explanation below.

Explanation:

Training and awareness play an essential role in the successful implementation of a comprehensive privacy program. This is especially true for an organization that has limited expertise on the subject.

Training and awareness help to ensure that everyone understands their obligations under the EU GDPR as well as other applicable laws and regulations, while also providing employees with best practices to ensure data protection.

One way to ensure optimal training and awareness is by creating a comprehensive training curriculum tailored specifically for XYZ's needs. The curriculum should cover topics such as data privacy rights, compliance requirements, impact assessment, access control measures, encryption technologies, incident response plans and more. Additionally, it should be augmented with practical examples so that employees can understand how these principles apply in different scenarios.

Moreover, a comprehensive awareness program should be established to keep all employees informed of the latest developments in privacy law. This can include newsletters, webinars and other communications that explain changes in laws or policies, provide information on new technologies, or even give advice on how to handle particular challenges.

Finally, management should ensure that there are measures in place to evaluate the effectiveness of the training and awareness programs. This can include surveys, interviews with staff members and other methods such as focus groups or workshops. All these means will help XYZ assess whether its employees understand their obligations under the GDPR and other applicable laws and regulations.

By creating a comprehensive training curriculum tailored specifically for its needs and establishing an effective awareness program, XYZ can ensure that everyone in the organization is better informed and aware of their responsibilities under the GDPR. This, in turn, will help to improve compliance with the applicable laws and regulations while protecting its customers' data. Ultimately, this will allow the company to realize its full potential on the European market.

By investing in training and awareness programs, XYZ demonstrates a commitment to proper privacy procedures which will not only benefit its operations in Europe but also those in the US. It is essential for any company operating today to prioritize privacy so that it can build client trust as well as remain compliant with regulations. With an effective training and awareness program in place, XYZ can confidently approach both current and potential clients knowing that their data will be secure.

Overall, training and awareness are important components of a successful privacy program. By investing in these programs, XYZ can ensure that everyone is informed and aware of their responsibilities under the GDPR and other applicable laws and regulations. This, in turn, will help to protect customer data while also improving compliance with applicable laws. Ultimately, this will help XYZ realize its full potential on the European market as well as build client trust.

By establishing a comprehensive training and awareness program, XYZ will be better prepared to handle the challenges of data privacy regulation. With the proper methods in place, the company can not only protect its customers' data but also remain compliant with laws and regulations. This, in turn, will help it achieve success on both domestic and international markets. Ultimately, investing in training and awareness is essential for any organization operating today.

Question No: 64

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PIS

The company has a well-defined and effectively implemented security policy. As in case of access control, the security controls vary in different client relationships based on the client requirements but certain basic or hygiene security practices / controls are implemented organization wide. The consultants have advised the information security function to realign the company's security policy, risk assessment, data classification, etc to include privacy aspects. But the consultants are struggling to make information security function understand what exact changes need to be made and the security function itself is unable to figure it out.

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Can you please guide the information security function to realign company's security initiatives to include privacy protection, keeping in mind that the client security requirements would vary across relationships? (250 to 500 words)

Answer: See the answer in explanation below.

Explanation:

The information security function of XYZ needs to realign the company's security initiatives to include privacy protection and make sure that it meets its client's requirements. The Information Security team must understand the legal and regulatory requirements for data privacy for each region in which XYZ operates, as well as industry standards such as ISO 27001/2 or NIST 800-53. This will help ensure that the organization is complying with applicable laws and regulations, while also helping build trust with clients by demonstrating that they take privacy seriously.

The Information Security team should also identify the most important risks associated with data privacy in order to determine what additional measures need to be taken in order to protect sensitive data from misuse or loss. The team should then assess the appropriate risk management and privacy controls to ensure that the data is being managed in a secure manner. This could include encryption of sensitive data, access control measures such as role-based permissions, and regular reviews of user access rights to ensure proper security protocols are being followed.

In addition, XYZ should create an internal privacy policy which outlines its commitment to protecting the privacy of customers and employees. The policy should be reviewed periodically to ensure it meets changing regulatory requirements and industry standards. The policy must also be communicated to all staff members so they know what their responsibilities are with regards to protecting personal data.

Finally, XYZ should have a robust incident response plan in place for when breaches or unauthorized access occur. This should cover procedures for detecting, investigating, and responding to potential data breaches. It should also include measures to prevent future incidents and ensure that customer data is protected going forward.

By taking these measures, XYZ will be able to meet its client's security requirements while also demonstrating its commitment to protecting the privacy of their customers. This can help build trust with existing clients as well as new ones, making it easier for them to do business with the company.

In addition, a comprehensive privacy protection program can help protect XYZ from costly legal or regulatory penalties in case of a data breach. Therefore, it is crucial for XYZ to invest in robust privacy protection initiatives in order to realize the full potential of the market.

Question No: 65

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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)

Answer: 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.

Question No: 66

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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 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 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 Indi a. 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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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: 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.

Question No: 67

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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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What should be the learning for the company going forward? What should the consultants suggest?

(250 to 500 words)

Answer: See the answer in explanation below.

Explanation:

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 No: 68

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Why do you think the company failed to defend itself against client accusations? (250 to 500 words)

Answer: See the answer in explanation below.

Explanation:

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 No: 69

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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.

(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 Afric a. 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 & 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)

Answer: See the answer in explanation below.

Explanation:

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.

Question No: 70

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PPP

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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)

Answer: 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.