

## Privacy and Data Protection for Delivery

- 1. Infosys is transitioning a scope of work from another vendor of client and as part of this transition Infosys will get access to clients data including PII. What should Infosys project team do in order to not cause any breach or violation of privacy regulation**
  - a. Since it is in transition phase, I will leave it to the transition team to decide
  - b. Assume that client is already aware and PII is supposed to be accessed by Infosys team
  - c. Inform client or delivery leadership of such access to PII and insist on having necessary safeguards in place. Infosys should also assess the risks prior to engaging in such processing.
  - d. Clients vendor had access to the PII data and the same is now transferred to Infosys. So no need to notify the client.
  
- 2. You are about to receive personal information from client as part of project execution. Which of the following is most appropriate about international data transfers?**
  - a. If you will have it transferred to offshore team using citrix client so that only data is viewed but cannot be copied to local machine, then you don't have to inform client
  - b. We have a duty to inform client about location of processing, and mutually agreed to implementation of appropriate safeguards while processing such data.
  - c. If you deploy appropriate safeguards such as encryption and data masking, data may be stored anywhere in the world.
  - d. In the internet era, any data may be accessed from anywhere in the world, and since client knows we are a global organization, we don't have to inform client about location of processing
  
- 3. You just discovered a data breach caused by our employee pertaining to client data. What among the following would not be an immediate step you would be taking?**

3. **You just discovered a data breach caused by our employee pertaining to client data. What among the following would not be an immediate step you would be taking?**
- a. Follow breach notification process of Infosys before informing the client
  - b. Immediately inform the DPO
  - c. Immediately inform the DP Authority of the country.
  - d. Do immediate damage control, e.g., remove file where it got disclosed
4. **Which of the following is not likely to be Personally Identifiable Information?**
- a. Contact number of client manager with whom Infosys engages as part of project delivery
  - b. Client provided personal financial information of its customers, that has been anonymized
  - c. Contact details available as part of ticket which needs to be serviced as part of contractual scope
  - d. Personal information processed by Infosys as part of project execution
5. **You have access to client email ID, Name, business contact details, title etc while handling day to day communication via Email (MS Outlook) or Chat platform (MS Teams, Skype etc). Do we still need to comply to privacy regulation?"**
- a. Yes. But it is only incidental in nature.
  - b. No
6. **In your project, client data (including PII - Personally Identifiable Information) can be accessed or viewed only from within client network via VPN or other remote connectivity. You don't have any**

scope

d. Personal information processed by Infosys as part of project execution

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a. Yes. But it is only incidental in nature.

b. No

6. **In your project, client data (including PII - Personally Identifiable Information) can be accessed or viewed only from within client network via VPN or other remote connectivity. You don't have any instructions to work on the data you get to access or view. Does it still qualify as 'Processing PII' under applicable privacy laws and regulations.**

a. No. Since there is no access to modify, add or delete data, it doesn't qualify as 'processing PII'

b. No. Even though we have access to modify, add or delete data, it is still within client network and data cannot be taken out of client network

c. No. Since there are system level restrictions on saving any data from client network to local system.

d. Yes. Even viewing of PII within client network is considered as 'Processing PII'