IAPP PRIVACY CERTIFICATION CANDIDATE HANDBOOK 2019

Procedures and Policies

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Version 3.3.0
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I. Overview

About the IAPP

The International Association of Privacy Professionals (IAPP) is the largest and most comprehensive global information privacy community and resource, helping practitioners develop and advance their careers and organizations manage and protect their data.

The IAPP is a not-for-profit association founded in 2000 with a mission to define, support and improve the privacy profession globally. We are committed to providing a forum for privacy professionals to share best practices, track trends, advance privacy management issues, standardize the designations for privacy professionals and provide education and guidance on opportunities in the field of information privacy.

The IAPP is responsible for developing and launching the gold standard in privacy and data protection certifications: the Certified Information Privacy Professional (CIPP), the Certified Information Privacy Manager (CIPM) and the Certified Information Privacy Technologist (CIPT). The CIPP, CIPM and CIPT are the leading privacy certifications for tens of thousands of professionals around the world who serve the privacy, data protection, information auditing, information security, data ethics, legal compliance and risk management needs of their organizations.

In addition, the IAPP offers a full suite of educational and professional development services and holds annual conferences that are recognized internationally as the leading forums for the discussion and debate of issues related to privacy policy and practice.

II. Accreditation

The IAPP’s CIPP/E, CIPP/US, CIPM and CIPT credentials are accredited by the American National Standards Institute (ANSI) under the International Organization for Standardization (ISO) standard 17024:2012. ANSI is an internationally respected accrediting body that assesses and accredits certification programs that meet rigorous standards. ANSI’s personnel certification accreditation program was the first such program in the United States to fulfill the requirements of ISO/IEC 17011, which represents the global benchmark for accreditation body practice.

Achieving accreditation is a tremendous acknowledgement of the quality and integrity of the IAPP’s certification programs as it:

- Ensures IAPP credentials are consistent, comparable and reliable worldwide, giving professionals the opportunity to have skills that translate across national lines.
- Protects the integrity and ensures the validity of the IAPP certification program.
• Promotes to employers, colleagues, clients and vendors that IAPP-certified professionals have the necessary knowledge, skills, and abilities to perform their work.

These IAPP credentials are rigorous ANSI/ISO-accredited professional certifications and the exams are stand-alone assessments designed to assess professional competence and experience. IAPP training materials are great studying tools, but they are not developed to ensure you pass the exam. You must diversify and customize your approach to studying.

CIPP/A and CIPP/C are the IAPP’s smallest designations and, at this time, do not have the test data to pursue accreditation. The same rigorous policies and procedures that apply to the IAPP’s larger certifications still apply to CIPP/A and CIPP/C and the IAPP hopes to have the data available to support accreditation for these credentials in the future.

**Statement of Non-Discrimination**

The IAPP endorses the principles of equal opportunity. Eligibility criteria for examination and certification as a Certified Information Privacy Professional, Certified Information Privacy Manager and Certified Information Privacy Technologist are applied equally to all individuals regardless of age, race, religion, gender, national origin, veteran status or disability.
III. Certification Programs

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<td>Retake: $375.00</td>
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Additional Credentials

**Fellow of Information Privacy (FIP)**

The IAPP recognizes those privacy professionals who have achieved a comprehensive knowledge of privacy law, privacy program management and relevant data protection practices by offering the Fellow of Information Privacy designation. Professionals demonstrate their eligibility for this designation by earning a combination of IAPP certifications, documenting relevant work experience and providing support from their peers. These are the specific requirements:

- Earn a CIPP designation (CIPP/A, CIPP/C, CIPP/E, CIPP/US) AND either a CIPM or a CIPT designation.
- Document three years of continuous and active work experience where data privacy represents at least 50 percent of your job responsibilities; an information security certification from ISC2, ISACA, IEEE, and others will satisfy one-year of the experience requirement.
- Provide names of three peers who are familiar with your work.
- Complete the FIP application form, including an explanation of how your experience and expertise qualifies you to be a FIP.

The FIP does not bear unique recertification requirements. As long as an individual maintains his or her CIPP and CIPM/CIPT credentials, the FIP remains active. Applications are reviewed by a
subcommittee of the Certification Advisory Board (CAB) and appeals are processed according to the IAPP certification body’s normal appeals policy. Successful applicants will receive a custom electronic certificate and will be listed on the IAPP website as fellows of information privacy, if they opt in. To apply and access necessary forms, follow this link.

American Bar Association Accreditation: Privacy Law Specialist
An ABA-Accredited designation demonstrating specialization in privacy law

The IAPP is accredited by the American Bar Association to certify lawyers in the specialty area of Privacy Law. U.S. attorneys who meet the IAPP’s rigorous specialist designation requirements may be permitted under their state’s rules of professional responsibility to advertise their specialization in privacy law.

The Privacy Law Specialist designation signifies substantial time practicing U.S. state and federal law relating to safeguarding personal information; knowledge of relevant privacy laws, regulations, and technology; and a commitment to staying ahead of new developments.

To be considered for Privacy Law Specialist status, you must:

- Be an attorney admitted in good standing in at least one U.S. state.
- Earn a CIPP/US designation.
- Earn either a CIPM or CIPT designation.
- Pass an ethics exam administered by the IAPP, or submit a recent MPRE score of 80+.
- Provide evidence of “ongoing and substantial” involvement in the practice of privacy law (at least 25% of your full-time practice over the last three years).
- Supply evidence of at least 36 hours of continuing education in privacy law for the three-year period preceding the application date.
- Provide five to eight peer references from attorneys, clients or judges who can personally attest to your qualifications.

For more information or to contact the IAPP with questions regarding the Privacy Law Specialist program, please visit the ABA Privacy Law Specialist page on the IAPP website.

IV. Registration Process

- Register for an exam.
- Complete the application statement and confidentiality agreements (provided at time of testing and listed at the end of this handbook for your reference under Forms).
• Fees: Certificants must pay an annual maintenance fee of $125. This fee will be automatically added to your exam order and will activate upon passing your exam.

  **Membership:** If you choose to become a member, the annual maintenance fee is included in your membership benefits.

### Scheduling an Exam

Computer-based exams can be purchased at any time through the [IAPP Store](https://www.iapp.org/store). An exam must be purchased before a candidate can schedule the exam. If you have purchased the wrong exam, please email certification@iapp.org or call 603.427.9200.

Once you have purchased your exam, follow the steps below to schedule:

1. Go to the **My Purchases** section of your “MyIAPP” account on iapp.org.
2. You will see the name of your exam under the **My Exams** heading.
3. You will be prompted to select if you need a special accommodation.
   - YES: your request will be submitted to the Certification Department and you will receive a follow-up email within 1-2 business days.
   - NO: You will be redirected to Pearson VUE’s scheduling platform.
4. Through Pearson VUE’s scheduling platform, you will be able to choose a test center, time and date.

**Candidates must schedule AND complete their exams within one year of purchases.** If you do not, your exam fee will be forfeited.

### Rescheduling, Cancellations and No Shows

If you need to reschedule, you can do so on the IAPP website by following the steps below. Rescheduling must be done more than 48 hours prior to the scheduled exam, test takers will not be able to reschedule once they are within 48 hours of their scheduled exam. Failure to reschedule in time or failure to appear for your appointment will result in the forfeiture of your exam fee. There is no limit on how many times you can reschedule your exam.

1. Go to the **My Purchases** section of your “MyIAPP” account on iapp.org.
2. You will see the name of your exam under the **My Exams** heading. You will see a green button next to it labeled **Continue to Pearson**. Click it.
3. Through Pearson Vue’s scheduling platform, you will be able to reschedule or cancel your scheduled exam.

Cancellations must be done more than 48 hours prior to the scheduled or the exam and exam fees will be forfeited. To cancel a scheduled exam, please follow the steps above.
Candidates who fail to show for their scheduled appointment will be deemed a no show and will forfeit their exam. A new exam will need to be purchased in order to test.

**Special Accommodations**
It is the policy of the IAPP to provide testing accommodations to candidates with qualifying disabilities to ensure each candidate a comparable opportunity for success on exams. Test takers will be prompted upon initially scheduling their exam to submit a request for a testing accommodation and scheduling permissions will be suspended. After this request is submitted, a member of the Certification Department will reach out within 1-2 business days requesting the required information. If an accommodation is approved, scheduling permissions through the MyIAPP portal will be reopened and the request will be sent to Pearson VUE, who will coordinate with the test taker to schedule the exam with approved accommodations. Please do not schedule an exam before requesting a testing accommodation.

**Exam Languages**
All IAPP examinations are administered in English. In addition, the CIPM and CIPP/E exam is available in French and German.

**Exam Sites**
IAPP CIPP/A, CIPP/C, CIPP/E, CIPP/US, CIPM and CIPT computer-based exams are administered through Pearson VUE testing centers at locations throughout the world. Available testing centers can be viewed upon scheduling an exam.

**V. Exam Day Information**
Confirmation of exam day details, including location, time and any building security procedures, will be emailed to you at the time you make your test center reservation and a reminder email will be sent 7 days prior to your day of testing. If you lose your reservation and are unable to access your account, please call the IAPP. You are responsible for identifying the best way to get to the exam location and where to park.

The IAPP will not be held responsible for expenses incurred beyond the cost of the exam, including but not limited to travel expense and lost wages on the day of the exam.

**Identification:**
You will need to bring two forms of identification, at least one of which must be a valid government-issued photo ID to gain admission to the exam. A driver’s license, passport, military ID on other government-issued ID will qualify. The name printed on your identification must match the name you used to register.
All IDs required must be issued by the country in which you are testing. If you do not have the qualifying ID issued from the country you are testing in, an International Travel Passport from your country of citizenship is required, along with a secondary ID.

If you have a name change between the date of your registration and the date of the exam, please bring documentation of the name change with you to the exam if you are unable to contact the IAPP prior to testing. Candidates who are turned away for not having proper identification will forfeit all exam fees.

Please click here for more information on ID requirements.

**Arrival Time for Exam**
It is important to allow enough time for the exam check-in process. The IAPP generally advises you to arrive *at least* 15 minutes, but no more than 30 minutes, prior to your exam reservation time in order to check in with testing center personnel.

If you plan to take more than one exam, you must make separate reservations for each. It may be possible to schedule both exams on the same day, but be sure you allow sufficient time.

**Test Center Exams Procedures**
When you check in with the proctor(s) at your exam location, you will be assigned to a computer workstation. At the beginning of the exam session, the proctor will activate the exam by instructing you to enter the appropriate code(s). Once you are in the exam, you will be able to navigate freely by moving back and forth between items. You will select your answer to each question by clicking on the option you believe to be correct. Your answers will be recorded and stored.

**Test Center Rules**
- No electronic devices may be taken into the exam room. Some test centers have lockers where you can leave personal possessions during the exam, but the IAPP advises you not to bring them with you.
- No reading material of any kind is allowed in the exam room.
- No food or drink is allowed in the exam room.
- No conversation between test-takers is allowed during the exam.
- Other than testing procedures, the proctor may not discuss any aspect of the exam with you at any time.
- You may be excused from the exam room by the proctor for the purpose of taking a stretch break or visiting a restroom. You will not be given additional time to make up for any time lost while you are out of the exam room. There are no scheduled breaks.
- Testing center personnel will explain any other procedures and rules when you arrive.
Note: Some testing centers may have specific rules and procedures. Be sure to read your reservation confirmation carefully.

Late Arrival at Test Center Exams
Because testing centers operate on schedules, and other test-takers may have exams after you, if you arrive late you may not be allowed to take your exam and will be considered a no-show, forfeiting all fees.

Failure to Report for Your Test Center Exam
If you fail to report for your examination(s) without proper notification to the IAPP (see Cancellation Policy above), your registration will be cancelled and all fees will be forfeited.

Dismissal
Any candidate who is observed engaging in any misconduct will be subject to dismissal from the examination, may be barred from future examinations for a period ranging from one year to permanent dismissal, and may be required to forfeit their current examination fee. Testing center proctors are authorized to take immediate, appropriate measures against candidates who are caught violating testing rules. The candidate is entitled to appeal the dismissal determination.

Results
You will receive your results immediately upon concluding your exam, and a confirmation print out will be provided by the testing center.

Exam results will update in the IAPP system after one business day.
VI. Exam Information

IAPP certification programs are designed to differentiate between candidates who do and who do not possess the knowledge required to be considered minimally qualified privacy professionals. All questions are multiple choice with some relating to scenarios. Each question has only one correct answer. Each item (question) consists of a clearly written question (stem), a correct or best response (key) that should be apparent to minimally qualified candidates and three incorrect responses (distractors) that will be plausible to not-minimally qualified candidates. Note that it is each candidate’s responsibility to be prepared for exams by being familiar with all elements of the Bodies of Knowledge.

The candidate is encouraged to read each question carefully. The stem may be in the form of an actual question or an incomplete statement. An exam question may require the candidate to choose the most appropriate answer based on a qualifier, such as MOST likely or BEST.

Scoring and Reporting

On all IAPP certification exams, each item has equal value and is scored as correct or incorrect. Unanswered items are considered incorrect, and there is no additional penalty for incorrect answers.

Passing scores are established through a process involving the expert opinion of our Exam Development Boards combined with data from the initial beta administration of an exam form. Passing a certification exam does not require 100 percent mastery, but rather the level of mastery determined by the Exam Development Board and approved by the Certification Advisory Board. Typically, passing scores range between about 65 and 80 percent correct, depending on the program and exam form.

All results are placed on a common scale, ranging from 100 to 500. The passing score for all IAPP exams is 300 (which does not represent 50 percent).

Passing

Candidates who successfully complete their CIPP, CIPM or CIPT designation exam will be granted the appropriate digital certificate through Accredible that will be emailed generally within three weeks of receiving their results.

The certification remains the property of the International Association of Privacy Professionals, which may withdraw, cancel, revoke, change the scope of, or otherwise annul the certification for cause.
Certification is a two-year term starting the day a candidate passes their exam. During this term, certificants are expected to maintain certification by submitting Continuing Privacy Education credits (CPE’s). Please view the IAPP Continuing Privacy Education Policy for more information.

**Failing**
Candidates who did not successfully complete the examination will be given a diagnostic report on the reason for their failing, which will show your scale score, the “fail” indicator and an indication of your relative performance on each major section of the examination. The section breakdown relates directly to the sections of the program’s Exam Blueprint. Each of the domains is weighted differently, as indicated by the number ranges in the Blueprint. As a result, you cannot average scores on all the domains to determine your specific score. Domain analysis is provided solely for the purpose of preparing for the next exam.

**Retaking the Exam**
In the event that a candidate fails to pass a certification test, the IAPP requires a waiting period of at least 30 days between the failed and subsequent attempt to pass that same test.

Candidates unsuccessful on the examination are permitted to sit for the next exam administration at a reduced fee of $375.

**VII. Certification Exam Score Review and Appeals**
The IAPP is responsible for and committed to accurate tabulation and reporting of privacy certification exam scores. If you receive a failing score in your exam results and wish to challenge it, the IAPP offers two options: score review and appeal.

**Score Review**
A score review is only available for paper/pencil exams, and is a hand scoring of your exam results conducted by an IAPP certification manager. This review will compare the exam answer key to your exam response sheet, with careful attention paid to ensure that your exam was scored correctly during the initial computer scoring. Please be aware that the IAPP hand scores all paper-pencil exams that fall within two correct responses of a passing score. It is extremely rare that a second review of your exam will result in a score change.

You must request a score review within 30 days of receiving your exam results. Please email certification@iapp.org with the subject line “Score Review Request.” Include your name, exam
date and location, and the exam you would like reviewed (i.e. CIPP concentration, CIPM or CIPT). There is no fee for a score review.

The IAPP will acknowledge receipt of your request via email and will conduct the review within five days and communicate the results to you.

**Appeal**

Under current IAPP examination development processes, exam items are written, reviewed and validated by qualified privacy professionals. The IAPP conducts an annual statistical review of all exams to identify questions that may be flawed or performing poorly, and issues a new version of each title as needed. Even with these processes, an occasional flawed question may remain unidentified. The appeals process is designed not only to ensure fairness for all candidates, but also as an additional mechanism to improve the quality of our exams.

If you wish to formally appeal your exam results based on concerns about one or more specific questions on an exam, you may file an appeal by completing our Certification Candidate Appeal form. Your appeal must be made in writing within 30 days of receiving the adverse determination. The written appeal must include the stated appeal, the reason for the appeal (including relevant supporting materials), and your email address, postal address and a phone number.

The IAPP will acknowledge receipt of the appeal within five days of receipt. The acknowledgement will include a description of the appeals policy. During the appeal process, the IAPP will review your exam results along with your specific question challenges. If the IAPP finds the question(s) you have challenged to be faulty or flawed and it is determined that the results of your exam were affected by the question(s), a new score may be calculated.

**Irregularities**

The IAPP and its test center partner strive to maintain an appropriate exam environment at all times, but occasionally irregularities may occur during a testing session. If you believe conditions at an exam session negatively impacted your performance, you may file a complaint to the IAPP Certification Department by completing our Certification Complaint Submission form within 30 days of the incidence occurrence. Your complaint should include as much information as possible, including testing location, exam taken, date and time, proctor name(s) and details about the irregularity you are reporting. Your complaint will be acknowledged within 10 days of receipt. The acknowledgement will include a description of the complaint process. The IAPP will investigate your complaint and issue a finding within 30 days. If we find that a significant irregularity in fact occurred and you did not pass your exam, we will normally issue you a complimentary exam re-take. Under no circumstances can we alter exam results on the basis of a testing irregularity.
Confidentiality
Information about candidates is considered confidential; however, verification of an individual's privacy certification will be released upon request of a third party, such as an employment company, once the certificant has provided written permission. Requests for verification of progress in attaining certification will be responded to in writing and provided only to the applicant/candidate, unless permission is granted in writing by the candidate for release to others.

Cheating
The IAPP and all CIPP, CIPM and CIPT certificants have a significant interest in maintaining the integrity of IAPP certification examinations, and the IAPP assumes all certification candidates sit for examinations without any form of inappropriate assistance. All examinations are proctored to ensure this is the case, and we hope never to observe any form of inappropriate assistance, such as crib sheets, access to electronic devices (which is prohibited during testing sessions) or sharing of answers between candidates. In the unlikely and unfortunate event one or more proctors observes such behavior, however, we will take the following actions:

- Candidates observed using inappropriate assistance will be informed during or after the session and invited to submit a statement, in writing, responding to the observations.
- Proctor(s) will submit a written statement detailing their observations.
- The candidate’s exam booklet, answer sheet (if paper/pencil testing) and any material confiscated by the proctor(s) will be thoroughly examined by the IAPP Certification Director for evidence of cheating.
- After reviewing the candidate statement, the proctor statement(s) and all accompanying evidence, the Certification Director will issue a finding and action to the candidate. If the finding concludes that cheating likely occurred, the action may include any or all of the following: invalidation of exam results, prohibition from future exams, revocation of existing certifications and revocation of IAPP membership.

Candidates have the right to appeal the Certification Director’s finding and action to the Certification Advisory Board (CAB). Any such appeal should be addressed to appeal@iapp.org within 10 days of receiving the finding and action.
VIII. Important Additional References

These references contain essential exam and certification information and are highly recommended for review. Authoritative Resource lists, available study material, trainings, and effective study tips can all be found in the links below.

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IX. Testing Forms

All candidates are required to sign the forms below before testing. Forms will be provided at the testing location.

Code of Professional Conduct

All IAPP certified individuals must agree to comply with the Certificant Code of Professional Conduct as outlined below. Accordingly, by signing below you hereby represent, warrant and covenant to the IAPP as follows:

- You will at all times conduct your business and/or professional activities with courtesy, honesty and integrity.
- You will at all times represent your IAPP related certifications and qualifications honestly and agree to only undertake those activities that you can reasonably expect to complete with the necessary skills, knowledge and competence.
- You will not represent any IAPP certification in a misleading way or use an IAPP certification in a manner that would bring the IAPP disrepute.
- You will strive to maintain and improve your professional knowledge and competence through regular self-assessments and continuing education or training.
- You will follow all certification policies, procedures, guidelines and requirements of the IAPP that are made available to you by the IAPP, as the same may be amended from time to time.
Candidate Application Statement

All candidates must sign the following Candidate Application Statement and agree to all policies, procedures, and terms and conditions of certification in order to be eligible for the certification.

Candidates will be required to complete this form immediately before each exam is administered. Accordingly, by signing below, the Candidate hereby represents, warrants and covenants as follows:

I hereby apply for certification as a Certified Information Privacy Professional (CIPP), Certified Information Privacy Manager (CIPM) or Certified Information Privacy Technologist (CIPT). I understand that my certification depends on my ability to meet all applicable requirements and qualifications. I certify that the information contained in this application is true, complete, and correct to the best of my knowledge and is made in good faith. I understand that the IAPP may need to gather additional information to clarify or supplement this application and I agree to promptly supply such additional information. I further understand that if any information is later determined to be false or misleading, the IAPP reserves the right to revoke any certification that has been granted on the basis thereof.

Should I be awarded the CIPP (CIPP/US, CIPP/C, CIPP/E, or CIPP/A), CIPM, or CIPT credential, I agree to abide by the IAPP Code of Professional Conduct, and to notify the IAPP if at any time I develop the incapacity to perform my professional responsibilities in accord with the standard of the certification.

Should the IAPP suspend my certification at any time, during the time of suspension I will not use the seal or marks of certification.

Should the IAPP withdraw my certification at any time I will return my certificate and cease use of the CIPP (CIPP/US, CIPP/C, CIPP/E, or CIPP/A), CIPM and/or CIPT designations and the seal of CIPP (CIPP/US, CIPP/C, CIPP/E, or CIPP/A), CIPM and/or CIPT.

In using the CIPP (CIPP/US, CIPP/C, CIPP/E, or CIPP/A), CIPM and/or CIPT, designations and the seals I will abide by the restrictions and conventions stated in this handbook. If notified of misuse by the IAPP, I will immediately correct my use of the CIPP (CIPP/US, CIPP/C, CIPP/E, or CIPP/A), CIPM and/or CIPT designations and logo as requested by the IAPP. I understand that the IAPP may withdraw my certification at any time if I fail to correct my use of such designations and logo.

I hereby release, discharge, and exonerate the IAPP, its directors, officers, members, examiners, representatives, and agents, from any actions, suits, obligations, damages, claims or demands arising out of, or in connection with, any aspect of the application process including results or any other decision that may result in a decision to not issue
me a certificate for any reason. If one or more provisions of this statement are found to be invalid, illegal or unenforceable, the validity, legality and enforceability of the remaining provisions of this statement will not be affected in any way thereby.
Candidate Confidentiality Agreement

To ensure the integrity of the Certified Information Privacy Professional (CIPP), Certified Information Privacy Manager (CIPM) and Certified Information Privacy Technologist (CIPT) examinations, all candidates must sign the Candidate Confidentiality Agreement set forth below. Candidates must complete this form immediately before each exam is administered. Accordingly by signing below the Candidate hereby represents, warrants and covenants as follows:

I understand, acknowledge and agree:

- That the questions and answers of the exam are the exclusive and confidential property of the IAPP and are protected by the IAPP’s intellectual property rights.
- That I will not disclose the exam questions or answers or discuss any of the content of the exam materials with any person, without prior written approval of the IAPP and I will not use any of the exam questions, answers or exam materials except as otherwise authorized by the IAPP.
- That I will not remove from the examination room any exam materials of any kind provided to me or any other material related to the exam, including, without limitation, any notes or calculations.
- That I will not copy or attempt to make copies (written, photocopied, or otherwise) of any exam material, including, without limitation, any exam questions or answers.
- That I will not sell, license, distribute, give away, or obtain from any other source other than the IAPP the exam materials, questions or answers.
- That I will not create or contribute to certification efforts competitive with the CIPP, CIPM or CIPT schemes for a period of three years from taking the examination.
- That my participation in any irregularity occurring during the examination, such as giving or obtaining unauthorized information or aid, as evidenced by an observation or subsequent statistical analysis, may be sufficient cause to invalidate the results of the examination or the certificate issues, or other appropriate remedy.
- That I am solely responsible for the answers provided on the test(s) and that they were not provided via assistance by other individuals.
- I agree that my obligations under this Agreement shall continue in effect after the examination and, if applicable, after termination of my certification, regardless of the reason or reasons for termination, and whether such termination is voluntary or involuntary.
- I acknowledge that the unauthorized use or disclosure of the IAPP’s information (including all exam questions, answers and exam materials) would cause the IAPP to incur irreparable harm for which monetary damages may be difficult to
ascertain or an inadequate remedy. Accordingly, I agree that the IAPP will have the right to seek equitable relief to enjoin any unauthorized use or disclosure of its information and materials, in addition to any other rights and remedies that it may have at law or otherwise.

- If one or more provisions of this Agreement are found to be invalid, illegal or unenforceable, the validity, legality and enforceability of the remaining provisions of this Agreement will not be affected in any way thereby. A waiver of my breach of any provision of this Agreement will not operate as or be deemed to be a waiver of my prior, concurrent or subsequent breach of that or any other provision of this Agreement.

- This Agreement may be amended or modified only with the written mutual consent of the IAPP and myself.