

**Feb 2023**



**BINDING CORPORATE RULES (EU):**

**APPENDIX 2**

**DATA SUBJECT RIGHTS PROCEDURE (CONTROLLER)**

## 1 INTRODUCTION

- 1.1 RGA's "Binding Corporate Rules: Controller Policy" and "Binding Corporate Rules: Processor Policy" (together the "**Policies**" or, respectively, the "**Controller Policy**" and the "**Processor Policy**") safeguard Personal Information transferred between RGA's group members ("**Group Members**").
- 1.2 Individuals whose Personal Information are processed by RGA under the Policies have certain data protection rights, which they may exercise by making a request to the Controller of their information (a "**Request**").
- 1.3 This Binding Corporate Rules: Data Subject Rights Procedure (Controller) ("**Procedure**") describes how RGA will respond to any Requests it receives from individuals whose Personal Information are Processed and transferred under the Controller Policy.

## 2 DATA SUBJECTS' DATA PROTECTION RIGHTS

- 2.1 RGA must assist individuals to exercise the following data protection rights, consistent with the requirements of Applicable Data Protection Laws:
  - 2.1.1 **Right to information:** This is the right for individuals to obtain confirmation as to whether or not Personal Information concerning them are being Processed;
  - 2.1.2 **Right of access:** This is the right for individuals to obtain confirmation whether a Controller Processes Personal Information about them and, if so, to be provided with details of that Personal Information and access to it in an intelligible form;
  - 2.1.3 **Right to rectification:** This is the right for individuals to obtain rectification without undue delay of inaccurate Personal Information a Controller may process about them;
  - 2.1.4 **Right to erasure:** This is the right for individuals to require a Controller to erase Personal Information about him/her on certain grounds – for example, where the Personal Information is no longer necessary to fulfil the purposes for which it was collected;
  - 2.1.5 **Right to restriction:** This is the right for individuals to require a Controller to restrict Processing of Personal Information about them on certain grounds;
  - 2.1.6 **Right to object:** This is the right for individual to object, on grounds relating to their particular situation, to a Controller's Processing of Personal Information about them, if certain grounds apply;
  - 2.1.7 **Right to data portability:** This is the right for individuals to receive Personal Information about them from a Controller in a structured, commonly used and machine-readable format and to transmit that information to another Controller if certain grounds apply.

## 3 RESPONSIBILITY TO RESPOND TO A REQUEST

- 3.1 The Controller of an individual's Personal Information is primarily responsible for responding to a Request and for helping the individual concerned to exercise his or her rights under Applicable Data Protection Laws.
- 3.2 As such, when an individual contacts RGA to make any Request then where RGA is the Controller of that individual's Personal Information under the Controller Policy, it must help the individual to exercise his or her data protection rights directly in accordance with this Procedure.

## **4 INITIAL ASSESSMENT OF A REQUEST**

- 4.1 Upon receiving any Request from an individual, RGA will ensure all such Requests are immediately routed to the Data Protection Team at [dsr@rgare.com](mailto:dsr@rgare.com). The Data Protection Team (consisting of the regional compliance functions) will document the date on which such Request was received together with any other information that may assist the Data Protection Team to deal with the Request.
- 4.2 The Data Protection Team will make an initial assessment of the Request as follows:
  - 4.2.1 the Data Protection Team will determine whether RGA is a Controller or Processor of the Personal Information that is the subject of the Request; and
  - 4.2.2 where Data Protection Team determines that RGA is a Controller of the Personal Information, it will then determine whether the Request has been made validly under Applicable Data Protection Laws and whether confirmation of identity, or any further information, is required in order to fulfil the Request.

## **5 RESPONSE TO A REQUEST**

- 5.1 If the Data Protection Team determines that RGA is the Controller of the Personal Information that is the subject of the Request, it will then contact the individual in writing to confirm receipt of the Request and seek confirmation of identity (if the individual's identity has not already been validated) as well as any further information it may need to action the individual's Request. RGA may Request such information, which it may reasonably require in order to confirm the identity of the individual making the Request and to locate the information which that person seeks.
- 5.2 If RGA is exempted under Applicable Data Protection Laws from fulfilling the Request (for example, because RGA can demonstrate that Request is manifestly unfounded or excessive), RGA will inform the individual of the exemption and the reasons for it.

- a) the purposes of the Processing;
- b) the categories of Personal Information concerned;
- c) the recipients or categories of recipient to whom the Personal Information have been or will be disclosed, in particular, recipients outside Europe;
- d) where possible, the envisaged period for which the Personal Information will be store



directly such information to another Controller (where technically feasible), RGA's Data Protection Team will consider and deal with such Request appropriately in accordance with Applicable Data Protection Laws insofar as the Processing is based on that individual's consent or on the performance of, or steps taken at the request of the individual prior to entry into, a contract.

## **9 QUESTIONS ABOUT THIS PROCEDURE**

- 9.1 All queries relating to this Procedure are to be addressed to RGA's Chief Privacy Officer at [dsr@rgare.com](mailto:dsr@rgare.com).

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