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GLOBAL BINDING CORPORATE RULES (EU):

PROCESSOR POLICY

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INTRODUCTION

The Binding Corporate Rules: Processor Policy ("**Processor Policy**") establishes RGA's approach to compliance with data protection law when Processing Personal Information on behalf of and under the instructions of a non-RGA Controller and where such Personal Information originates in Europe, specifically with regard to transfers of '(o)-16.1.2 (i)5-(b)7.7A(e)8.4r)[T]-3.0.0(5(l)7c7(5e)2]TP4(A)-12.3(e)]-35.5 -35.7453 5-0(Tn)(

Definitions

For the purposes of this Processor

"Sensitive Personal Information"	means information that relates to an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, or data concerning a natural person's sex life or sexual orientation. It also includes information about an individual's criminal offences or convictions, as well as any other information deemed sensitive under Applicable Data Protection Laws; and
"Workforce Members"	refers to all employees, new hires, individual contractors and consultants, and temporary members of the Workforce engaged by

PART I: BACKGROUND AND SCOPE

WHAT IS DATA PROTECTION LAW?

Applicable Data Protection Laws give individuals certain rights in connection with the way in which their Personal Information is used. If organizations do not comply with Applicable Data Protection Laws, they may be subject to sanctions and penalties imposed by the national data protection authorities and the courts. When RGA Processes Personal Information to provide a service to a Controller, this activity and the Personal Information in question are covered and regulated by Applicable Data Protection Laws.

According to Applicable Data Protection Laws, when an organization determines the purposes for which Personal Information are to be Processed and the means by which the Personal InfoTw 3.036 04.099 Tw 0.7 (i)58.4 (on)

Some Group Members may act as Controllers under some circumstances and as Processors under different circumstances. Such Group Members must comply with this Processor Policy and the Controller Policy, as appropriate.

If at any time it is not clear to a Group Member as to what its legal status as Controller or Processor would be and which policy applies, Personal Information as a Controller or Processor, such Group Member must contact the Chief Privacy Officer whose contact details are provided below.

FURTHER INFORMATION

If you have any questions regarding the provisions of this Processor Policy, your rights under this Processor

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PART II: PROCESSOR OBLIGATIONS

This Processor Policy applies in all situations where a Group Member Processes Personal Information as a Processor on behalf of a third party Controller.

Part II of this Processor Policy is divided into three sections:

- Section A identifies and describes the

SECTION A: BASIC PRINCIPLES

RULE 1 – LAWFULNESS OF PROCESSING

Rule 1A – RGA will ensure that all Processing is carried out in accordance with Applicable Data Protection Laws.

RGA will comply with all Applicable Data Protection Laws, including any laws governing the protection of Personal Information (e.g. in Europe, the General Data Protection Regulation 2016/679 and any national data protection laws) and will ensure that all Personal Information is Processed in accordance with Applicable Data Protection Laws.

To the extent that a

required under the terms of the contract with a particular Controller to provide information about any sub-processors appointed by RGA to Process Personal Information on its behalf

organizational security measures to safeguard the Personal Information and will impose strict contractual obligations, in writing, on the sub-processor, which provide:

- commitments on the part of the sub-processor to comply with the same data protection contractual provisions as between RGA and the Controller;
- commitments on the part of the sub-processor regarding the security of that Personal Information, consistent with those contained in this Processor Policy (and in particular Rules 6A and 6B above) and with the terms of the contract RGA has with the Controller in respect of the Processing in question;
- that the sub-processor will act only on RGA's instructions in the course of Processing the Personal Information; and
- such obligations as may be necessary to ensure that the commitments on the part of the sub-processor reflect those made by RGA in this Processor Policy, and which, in particular, provide for adequate safeguards with respect to the privacy and fundamental rights and freedoms of

RGA shall maintain and update a record of all the Processing activities carried out on behalf of a Controller. This record will be maintained in writing (including in electronic form) and will be made available to the data protection authorities on request.

RULE 10 – TRAINING

Rule 10 – RGA will provide appropriate training to Workforce Members who have permanent or regular access to Personal Information, who are involved in the Processing of Personal Information or in the development of tools used to Process Personal Information in accordance with the Privacy Training Program (Processor) set out in Appendix 4.

RULE 11 – AUDIT

Rule 11 – RGA will verify compliance with this Processor Policy and will carry out data protection audits on a regular basis in accordance with the Audit Protocol (Processor) set out in Appendix 5.

RULE

International Reinsurance Company dac (Ireland) to enforce compliance with this Processor Policy, whether in relation to non-compliance by an EEA Entity or non-EEA Entity, before the competent courts of the EEA

APPENDIX 2

DATA SUBJECT RIGHTS PROCEDURE (PROCESSOR)

APPENDIX 4

PRIVACY TRAINING PROGRAM (PROCESSOR)

APPENDIX 5

AUDIT PROTOCOL (PROCESSOR)

APPENDIX 7

COOPERATION PROCEDURE (PROCESSOR)

APPENDIX 8

UPDATING PROCEDURE (PROCESSOR)

APPENDIX 9

LAW ENFORCEMENT DATA ACCESS PROCEDURE (PROCESSOR)