

1 INTRODUCTION

- 1.1 The “Binding Corporate Rules (UK): Controller Policy” and “Binding Corporate Rules (UK): Processor Policy” (together the “**Policies**” or, respectively, the “**Controller Policy**” and the “**Processor Policy**”)

- 3.2.2 as part of a regular refresher training at least once every two years (the timing of which is determined by RGA's Data Protection Team); and
 - 3.2.3 when necessary based on changes in the law or to address any compliance issues arising from time to time.
- 3.3 Certain Workforce Members will receive specialist training, including those who are involved in