

September 2024



BINDING CORPORATE RULES (UK):

APPENDIX 3

PRIVACY COMPLIANCE STRUCTURE (UK) (CONTROLLER)

reports to the Chief Security and Privacy Officer and the Board of Directors of RGA UK Services (and Boards of other Group Members in EMEA).

3.2 The DPO is involved in issues that relate to the protection of Personal Information. In particular, the tasks of the DPO are:

3.2.1 To inform and advise RGA and the Workforce Members who Process and/or handle Personal Information of their obligations under Applicable Data Protection Laws;

3.2.2 To monitor compliance with Applicable Data Protection Laws, and with the policies of RGA (including the Policies) that relate to the protection of Personal Information, including the assignment of responsibilities, awareness raising, and training of Workforce Members involved in Processing operations, and the related audits;

3.2.3 To provide advice, where requested, as regards data protection impact assessments and to monitor the performance of the data protection impact assessment process;

3.2.4 To cooperate with the Information Commissioner; and

3.2.5 To be the point of contact for the Information Commissioner on issues relating to Processing, including in the context of a prior consultation, and to consult, where appropriate, with regard to any other matter; and the DPO shall, in the performance of his or her tasks, have due regard to the risks associated with Processing operations, taking into account the nature, scope, context, and purposes of P

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- 4.1.4 Supporting regular audits of the Policies, coordinating responses to audit findings and supporting remediation of any issues raised by audit findings;
- 4.1.5 Responding to inquiries of the Information Commissioner where appropriate;
- 4.1.6 Monitoring changes to global privacy laws and ensuring that appropriate changes are made to the Policies and RGA's related policies and business practices;
- 4.1.7 Overseeing training for Workforce Members on the Policies and data protection legal requirements in accordance with the requirements of the Privacy Training Program (UK) (Controller or Processor, as applicable);
- 4.1.8 Promoting the Policies and privacy awareness across business units and functional areas through privacy communications and initiatives;
- 4.1.9 Evaluating privacy processes and procedures to ensure sustainability and effectiveness;
- 4.1.10 Periodic reporting on the status of the Policies to the Chief Security and Privacy Officer and Board of Directors and / or Audit Committee, as appropriate;
- 4.1.11 Ensuring that the

- 5.1.2 Assisting the Data Protection Team with the day-to-day implementation and enforcement of RGA's privacy policies (including the Policies) within their respective areas of responsibility;
 - 5.1.3 Escalating questions and compliance issues or communicating any actual or potential violation of relating to the Policies to the Data Protection Team; and
 - 5.1.4 Through its liaison with the Data Protection Team, the Privacy Committee serves as a channel through which the Data Protection Team can communicate data privacy compliance actions to all key functional areas of the business.
- 5.2 The Privacy Committee will meet on a formal and regular basis, at a minimum frequency of every six months, to ensure a coordinated approach to data protection compliance across all functions.

6 RGA WORKFORCE MEMBERS

- 6.1 All RGA Workforce Members are responsible for supporting the functional Privacy Committee members on a day-to-day basis and adhering to RGA's privacy policies. In addition, RGA Workforce Members are responsible for escalating and communicating any potential violation of the privacy policies to the appropriate Privacy Committee Member or, if they prefer, the RGA Data Protection Team. On receipt of a notification of a potential violation of the privacy policy the issue will be investigated to determine if an actual violation occurred. Results of such investigations will be documented.

CHANGE LOG

Date	Version	Change
Sep 2023	1.0	First (non-Draft) version
Sep 2024	1.1	Word missing (“Officer”) in Section 2.1; punctuation in 2.2.8

Figure 1: Overview of RGA's Data Protection & Privacy Compliance Structure

