

September 2024



BINDING CORPORATE RULES (UK):

APPENDIX 3

PRIVACY COMPLIANCE STRUCTURE (UK) (PROCESSOR)

- 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 Processing.

4 DATA PROTECTION TEAM

4.1 RGA's Data Protection Team is comprised of RGA's Chief Security and Privacy Officer, the Global Data Protection Office (functionally situated in RGA's Global IT organization, physically located in RGA's offices in St Louis, London and Hong Kong) and RGA's Data Protection and Privacy Counsel (functionally situated within RGA's Global Legal Services organization). Incorporating members from RGA's Security and Privacy and Legal Services teams ensures appropriate independence and oversight of duties relating to all aspects of RGA's data protection compliance. The Data Protection Team is accountable for managing and implementing RGA's data privacy program internally (including the Policies), advising the organization on Applicable Data Protection Laws and privacy risks, providing recommendations and advice for complying with Applicable Data Protection Laws and for ensuring that effective data privacy controls are in place for any third party service provider RGA engages. In this way, the Data Protection Team is actively engaged in addressing matters relating to RGA's privacy compliance on a routine, day-to-day basis. The responsibilities of the Data Protection Team include:

- 4.1.1 Providing guidance about the collection and use of Personal Information subject to the Policies and to assess the Processing of Personal Information by RGA Group Members for potential privacy-related risks;
- 4.1.2 Responding to inquiries and compliance actions relating to the Policies from Workforce Members, Customers, Clients, and other third parties raised directly with the Data Protection Team or through its dedicated e-mail address at privacy@rgare.com;
- 4.1.3 Working closely with the Privacy Committee (defined at point 5 below) in sustaining compliance with the Policies and related policies and practices at a functional and local level appropriate for the UK and in evaluating privacy

- 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 commitments made by RGA in relation to updating, and communicating updates to the Policies as set out in the Binding Corporate Rules (UK): Updating Procedure (UK) (Controller or Processor, as applicable), are met;
- 4.1.12 Overseeing compliance with the Data Subject Rights Procedure (UK) (Controller or Processor, as applicable) and the handling of requests made thereunder; and
- 4.1.13

- 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.

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

