

September 2023



BINDING CORPORATE RULES (UK):

APPENDIX 6

COMPLAINT HANDLING PROCEDURE (UK) (PROCESSOR)

1 INTRODUCTION

- 1.1 RGA's "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**") safeguard Personal Information transferred between the RGA group members ("**Group Members**"). In order to affect Data Subjects third-party beneficiary rights under the UK Binding Corporate Rules, RGA maintains a Complaint Handling Process for Data Subjects to directly contact RGA regarding its compliance with the Policies. The purpose of this Complaint Handling Procedure (UK) (Processor) is to describe the practical steps Data Subjects whose Personal Information is Processed by RGA under the Processor Policy may take to submit complaints and how such complaints are dealt with by RGA.
- 1.2 Where RGA Processes Personal Information on behalf of a Controller, this procedure will be made available to that Controller (under the Processor Policy).

2 HOW DATA SUBJECTS CAN BRING COMPLAINTS

Data Subjects may bring complaints in writing by contacting RGA's Chief Security and Privacy Officer at privacy@rgare.com, or contact any of the RGA UK BCR Entities listed in Appendix 1.

3 COMPLAINTS WHERE RGA IS A PROCESSOR

- 3.1 Where a Data Subject brings a complaint regarding the Processing of Personal Information where RGA is acting as a Processor in respect of that information, RGA will communicate without undue delay the details of the complaint to the Controller in compliance with all applicable internal procedures and act strictly in accordance with the terms of the contract between the Controller and RGA. If the Controller requires that RGA investigate the complaint, RGA will handle such complaints in accordance with section 5 of this Complaint Handling Procedure (UK) (Processor).

What happens when a Controller ceases to exist?

- 3.2 In circumstances where a Controller has disappeared, no longer exists or has become insolvent, Data Subjects whose Personal Information is processed in accordance with Applicable Data Protection Laws and transferred between Group Members on behalf of that Controller have the right to bring a complaint against RGA. RGA will handle such complaints in accordance with section 5 of this Complaint Handling Procedure (UK) (Processor).
- 3.3 In such cases, Data Subjects also have the right to bring a complaint to the Information Commissioner and/or to lodge a claim with a UK court and this includes where they are not satisfied with the way in which their complaint has been resolved by RGA as described above. Data Subjects entitled to such rights will be notified accordingly as part of the complaint handling procedure.

4 RIGHT TO COMPLAIN TO THE INFORMATION COMMISSIONER AND/OR TO LODGE A CLAIM WITH A UK COURT

- 4.1 Regardless of whether or not they have first complained directly to RGA, Data Subjects have the right at all times to complain to the Information Commissioner and/or to lodge a claim with a UK Court in accordance with Applicable Data Protection Laws.
- 4.2 In the event that the matter relates to Personal Information which was transferred from the UK under this policy to a Group Member outside the United Kingdom and a Data Subject wants to make a claim against RGA, the claim may be made against RGA UK Services.

5 COMPLAINTS HANDLING BY RGA IN PLACE OF THE CONTROLLER

Who handles complaints?

- 5.1 RGA's Data Protection Team will handle all complaints arising under the Processor Policy. RGA's Chief Security and Privacy Officer will liaise with colleagues from relevant business and support units as appropriate to address the issues raised in the complaint.

What is the response time?

- 5.2 RGA's Data Protection Team will acknowledge receipt of a complaint to the Data Subject concerned within 5 working days by sending a Complaint Receipt and Acknowledgment response email to the complainant Data Subject. Thereafter, RGA will investigate the merits of the complaint, the underlying facts and circumstances surrounding the issues raised and will provide a substantive response within one month of the receipt of the complaint.
- 5.3 If, due to the complexity of the complaint or number of requests, a substantive response cannot be provided within this period, RGA's Data Protection Team will advise the complainant accordingly and provide a reasonable estimate (not exceeding a maximum of two further months) for the timescale within which a response will be provided. Every effort will be made to provide a substantive response to the Data Subject without unreasonable delay and RGA shall at all times consider the interests of the Data Subject.
- 5.4 If the complaint is upheld, the Chief Security and Privacy Officer will arrange for any necessary steps to be taken as a consequence.

What happens if a complainant disputes a finding?

- 5.5 If the complainant disputes the response from RGA's Data Protection Team or any aspect of a finding and notifies RGA's Data Protection Team, the matter will be referred to RGA's Chief Security and Privacy Officer. The Chief Security and Privacy Officer will review the case and advise the complainant of his/her decision either to accept the original finding or to substitute a new finding. The Chief Security and Privacy Officer will respond to the complainant within one month of the receipt of the complaint. As part of the review, the Chief Security and Privacy Officer may arrange to meet the parties to the complaint in an attempt to resolve it. If, due to the complexity of the complaint, a substantive response cannot be given within this period, the Chief Security and Privacy Officer will advise the complainant accordingly and provide a reasonable estimate for the timescale within which a response will be provided which will not exceed three months from the date the complaint was referred.
- 5.6 If the complainant persists in disputing the substantive response and/or resolution proposed by the Chief Security and Privacy Officer, the Chief Security and Privacy Officer will arrange for any necessary steps to be taken as a consequence, including involvement of the UK Data Protection Officer.