

May 2025

GLOBAL BINDING CORPORATE RULES (EU)
APPENDIX 9
IN SCOPE DATA TRANSFERS (CONTROLLER)



In scope data transfers:

This table identifies the EEA sourced personal data that is transferred out of the EEA by the RGA entity acting as the Controller. It lists the categories of Data Subjects and the types of data transferred to non-EEA RGA entities and for what purpose.

Note: Some recipient RGA entities listed here may be established in jurisdictions currently deemed Adequate by the EU. Where this is the case then personal data will flow using 'Adequacy' as the transfer mechanism. (This list is a comprehensive list of transfers. All transfers are included here as EU Adequacy status *could* change for some entities in which case these Binding Corporate Rules will become the transfer mechanism).

From RGA (EEA) Entity	Purpose for BCR / After Transfer	To RGA (Non-EEA) Entity [Country]	RGA (Non-EEA) Entity acting as...	Data Subject Categories	Data Elements - Personal Data	Data Elements - Special Category Personal Data
RGA International Reinsurance Company dac [Ireland Branch]	Performance of Checks for Employment Purposes – Ireland local law	RGA UK Services Limited [United Kingdom]	Processor	Workforce Members, Job Applicants	Education, Personal Characteristics, Financial-Related Information, Employment Information, Name and Initials, Personal Directory Information, Government-Issued Identification Numbers	Criminal Convictions
		RGA International Corporation [Canada]	Processor			
RGA International Reinsurance Company dac [Italy Branch]	Performance of Background Checks for Employment Purposes	RGA UK Services Limited [United Kingdom]	Processor	Workforce Members, Job Applicants	Personal Characteristics, Personal Directory Information, Name and Initials	N/A
		RGA International Corporation [Canada]	Processor			
RGA International Reinsurance Company dac [France Branch]	Performance of Background Checks for Employment Purposes	RGA UK Services Limited [United Kingdom]	Processor	Workforce Members, Job Applicants	Personal Characteristics, Personal Directory Information, Name and Initials	N/A
		RGA International Corporation [Canada]	Processor			

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From RGA (EEA) Entity	Purpose for BCR / After Transfer	To RGA (Non-EEA) Entity [Country]	RGA (Non-EEA) Entity acting as...	Data Subject Categories	Data Elements - Personal Data	Data Elements - Special Category Personal Data
RGA International Reinsurance Company dac [Spain Branch]	Performance of Background Checks for Employment Purposes	RGA UK Services Limited [United Kingdom]	Processor	Workforce Members, Job Applicants	Financial-Related Information, Name and Initials, Government-Issued Identification Numbers	N/A
RGA International Reinsurance Company Designated Activity Company [Ireland]	HR - Benefits	RGA UK Services Limited [United Kingdom]	Processor	Workforce Members	Employment Information, Children Information, Personal Characteristics, Name and Initials, Personal Directory Information, Financial-Related Information, Government-Issued Identification Numbers	Health Information
RGA International Reinsurance Company dac [Germany, Italy, Netherlands, Poland, Spain Branches]	HR - Benefits	RGA UK Services Limited [United Kingdom]	Controller [Spain] and Processor	Workforce Members, Beneficiaries [Spain], Children	Education [Germany], Personal Characteristics, Government-Issued Identification Numbers, Employment Information, Name and Initials, Personal Directory Information, Policy Details, Children Information [Italy, Spain], Financial-Related Information	N/A
RGA International Reinsurance Company dac [EU Branches]	HR - Benefits	RGA Enterprise Services Company [United States]	Controller	Workforce Members	Employment Information, Name and Initials, Financial-Related Information, Personal Characteristics, Personal	N/A

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From RGA (EEA) Entity	Purpose for BCR / After Transfer	To RGA (Non-EEA) Entity [Country]	RGA (Non-EEA) Entity acting as...	Data Subject Categories	Data Elements - Personal Data	Data Elements - Special Category Personal Data
				Directory Information, Government-Issued Identification Number		
RGA International Reinsurance Company dac [France, Italy, Spain Branches]	Adjudication of Claims	RGA REINSURANCE COMPANY [United States]	Controller	Policyholders	Policy Details, Personal Characteristics, Name and Initials, Personal Directory Information, Government-Issued Identification Numbers, Employment Information, Financial-Related Information	Health Information
		RGA Enterprise Services Company [United States]	Processor			
		RGA UK Services Limited [United Kingdom]	Controller and Processor			
		RGA International Corporation [Canada]	Processor			
RGA International Reinsurance Company dac [France, Germany, Ireland, Italy, Netherlands Branches]	Administration of Claims	RGA Americas Reinsurance Company, Ltd. [Bermuda]	Controller	Policyholders, Beneficiaries	Policy Details, Personal Characteristics, Name and Initials, Financial Related Information, Employment Information, Government-Issued Identification Numbers, Personal Directory Information, Children Information, Segmentation Attributes	Health Information
		RGA International Reinsurance Company dac, U.K. Branch Office [United Kingdom Branch]	Controller			
		RGA Americas Reinsurance Company, Ltd., South Africa Branch [South Africa]	Controller and Processor			
		RGA UK Services Limited [United Kingdom]	Controller and Processor			

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From RGA (EEA) Entity	Purpose for BCR / After Transfer	To RGA (Non-EEA) Entity [Country]	RGA (Non-EEA) Entity acting as...	Data Subject Categories	Data Elements - Personal Data	Data Elements - Special Category Personal Data
		RGA Enterprise Services Company [United States]	Processor			
		RGA International Corporation [Canada]	Processor			
		RGA Reinsurance Company of South Africa Limited [South Africa]	Processor			
RGA International Reinsurance Company dac [Germany, Ireland, Italy, Netherlands, Poland, Spain Branches]	For the administration of reinsurance products	RGA Americas Reinsurance Company, Ltd. [Bermuda]	Controller	Policyholders, Beneficiaries	Policy Details, Personal Characteristics, Name and Initials, Personal Directory Information, Government-Issued Identification Numbers, Employment Information, Children Information, Financial-Related Information, Segmentation Attributes, Education, Device Information	Health Information
		RGA UK Services Limited [United Kingdom]	Controller and Processor			
		RGA Enterprise Services Company [United States]	Processor			
		RGA International Reinsurance Company dac [United Kingdom Branch]	Controller			
		RGA International Corporation [Canada]	Processor			
		RGA Life Reinsurance Company of Canada [Canada]	Processor			
RGA International Reinsurance Company	For the administration of reinsurance products	RGA Americas Reinsurance Company, Ltd. [Bermuda]	Controller	Policyholders, Beneficiaries	Policy Details, Personal Characteristics, Government-Issued	Health Information

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From RGA (EEA) Entity	Purpose for BCR / After Transfer	To RGA (Non-EEA) Entity [Country]	RGA (Non-EEA) Entity acting as...	Data Subject Categories	Data Elements - Personal Data	Data Elements - Special Category Personal Data
dac [France Branch]		RGA Enterprise Services Company [United States]	Processor		Identification Numbers, Name and Initials	
		RGA UK Services Limited [United Kingdom]	Processor			
		RGA International Corporation [Canada]	Processor			
RGA International Reinsurance Company dac [EU Branches]	To perform meaningful analysis to improve employee programs, workplace practices, and policies	RGA Enterprise Services Company [United States]	Controller	Workforce Members	Name and Initials, Employment Information, Personal Characteristics, Personal Directory Information	Racial or Ethnic Origin
RGA International Reinsurance Company Designated Activity Company [Ireland, Germany, France]	Audit	RGA Enterprise Services Company [United States]	Controller and Processor	Workforce Members, Policyholders, Borrows (Lenders), Job Applicants, Business Clients, Beneficiaries	Personal Characteristics, Name and Initials, Personal Directory Information, Education, Employment Information, Financial-Related Information, Policy Details, Children Information, Government-Issued Identification Number, Device Information	Health Information
		RGA UK Services Limited [United Kingdom]	Controller and Processor			
		RGA Reinsurance Company Hong Kong Branch [Hong Kong]	Controller			
		RGA Reinsurance Company of Australia Limited [Australia]	Controller			
		RGA International Corporation [Canada]	Processor			

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From RGA (EEA) Entity	Purpose for BCR / After Transfer	To RGA (Non-EEA) Entity [Country]	RGA (Non-EEA) Entity acting as...	Data Subject Categories	Data Elements - Personal Data	Data Elements - Special Category Personal Data
		RGA Partners Japan GK [Japan]	Processor			
RGA International Reinsurance Company dac [EU Branches]	HR - Training	RGA Enterprise Services Company [United States]	Controller and Processor	Workforce Members, Senior Level Executives	Name and Initials, Personal Directory Information, Personal Characteristics, Employment Information, Device Information	N/A
		RGA UK Services Limited [United Kingdom]	Processor			
		RGA International Corporation [Canada]	Processor			
RGA International Reinsurance Company Designated Activity Company [Ireland, France Branches]	Retrocession	RGA Enterprise Services Company [United States]	Controller and Processor	Policyholders Children	Name and Initials, Personal Characteristics, Smoker Status, Policy Details	Health Information
		RGA UK Services Limited [United Kingdom]	Processor			
		RGA International Corporation [Canada]	Processor			
		RGA International Reinsurance Company dac [United Kingdom Branch]	Controller			
		Reinsurance Group of America, Incorporated [United States]	Controller			
		RGA Reinsurance Company [United States]	Controller			

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From RGA (EEA) Entity	Purpose for BCR / After Transfer	To RGA (Non-EEA) Entity [Country]	RGA (Non-EEA) Entity acting as...	Data Subject Categories	Data Elements - Personal Data	Data Elements - Special Category Personal Data
RGA International Reinsurance Company dac [EU Branches]	To manage RGA's risk environment	RGA Enterprise Services Company [United States] RGA UK Services Limited [United Kingdom]	Controller and Processor Processor	Workforce Members, Policyholders	Employment Information, Personal Characteristics, Personal Directory Information, Name and Initials, Financial-Related Information, Policy Details, Device Information	Trade-Union Membership, Religious or Philosophical Beliefs, Political Affiliations or Opinions, Health Information
RGA International Reinsurance Company Designated Activity Company [EU Branches]	To manage expenses	RGA UK Services Limited [United Kingdom] RGA Enterprise Services Company [United States] RGA International Corporation [Canada]	Controller and Processor Processor Processor	Workforce Members	Name and Initials, Personal Directory Information, Employment Information	N/A

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RGA International Reinsurance Company dac [EU Branches]	Management of RGA events for attendees	RGA Enterprise Services Company [United States]	Controller	Potential Business Clients, Business Clients, Consumers, Workforce Members	Name and Initials, Personal Directory Information, Opt In / Opt Out Choice, Employment Information, Personal Characteristics, Dietary Restrictions / Food Allergies, Device Information, Geo-Location / Global Positioning System (GPS), Credit Card Information	N/A
		RGA UK Services Limited [United Kingdom]	Controller			
		Tindall Associates, Inc. [Canada]	Controller			
RGA International Reinsurance Company dac [France, Germany, Ireland, Italy, Spain Branches]	Valuation of Insurance Policies	RGA Enterprise Services Company [United States]	Processor	Policyholders, Beneficiaries	Personal Characteristics, Policy Details, Children Information, Smoker Status, Name and Initials, Government-Issued Identification Numbers	N/A
		RGA International Corporation [Canada]	Processor			
		RGA UK Services Limited [United Kingdom]	Processor			
RGA International Reinsurance Company dac [EU Branches]	Regulatory Compliance	RGA Enterprise Services Company [United States]	Controller and Processor	Board of Directors, Senior-Level Executives, Workforce Members, Policyholders, Business Clients	Name and Initials, Employment Information, Personal Directory Information, Financial-Related Information, Policy Details, Children Information, Government-Issued Identification Numbers, Device Information	N/A
		RGA UK Services Limited [United Kingdom]	Controller and Processor			
		RGA Americas Reinsurance Company, LTD. [South Africa Branch]	Controller			

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		RGA Reinsurance Company of South Africa Limited [South Africa]	Controller			
		RGA International Corporation [Canada]	Processor			
		RGA International Division Sydney Office Pty Limited [Australia]	Controller			
RGA International Reinsurance Company dac [France, Germany, Ireland, Italy, Netherlands Branches]	To offer our products and services	RGA International Corporation [Canada]	Processor	Business Clients, Potential Business Clients	Personal Characteristics, Personal Directory Information, Employment Information, Visitor Report/Log, Opt In / Opt Out Choice, Name and Initials, Device Information	Racial or Ethnic Origin
		RGA Enterprise Services Company [United States]	Controller			
RGA International Reinsurance Company dac [France Branch]	Pricing of reinsurance Products	-RGA Americas Reinsurance Company, Ltd. [Bermuda]	Controller	Policyholders	Personal Characteristics, Employment Information, Policy Details, Personal Directory Information, Financial- Related Information, Name and Initials	N/A
		RGA UK Services Limited [United Kingdom]	Processor			
		RGA Enterprise Services [United States]	Processor			
RGA International Reinsurance Company dac [Ireland, Netherlands, Poland, Spain Branches]	Pricing of reinsurance Products	RGA Enterprise Services Company [United States]	Processor	Policyholders	Personal Characteristics, Personal Directory Information, Policy Details,	N/A

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		RGA UK Services Limited [United Kingdom]	Processor		Employment Information, Smoker Status, Name and Initials, Education [Spain], Financial-Related Information	
		RGA International Corporation [Canada]	Processor			
RGA International Reinsurance Company dac [Italy Branch]	Pricing of reinsurance Products	RGA Americas Reinsurance Company, Ltd. [Bermuda]	Controller	Policyholders, Consumers, Beneficiaries	Policy Details, Personal Characteristics, Name and Initials, Employment Information, Children Information, Segmentation Attributes, Government-Issued Identification Number, Financial-Related Information	Health Information
		RGA UK Services Limited [United Kingdom]	Processor			
		RGA International Company [Canada]	Processor			
		RGA Enterprise Services [United States]	Processor			
RGA International Reinsurance Company dac [Ireland, Netherlands Branch]	To develop and enhance pricing models	RGA Enterprise Services Company [United States]	Processor	Policyholders, Beneficiaries	Personal Characteristics, Personal Directory Information, Policy Details, Employment Information	N/A
		RGA UK Services Limited [United Kingdom]	Processor			
		RGA International Corporation [Canada]	Processor			
RGA International Reinsurance Company dac [EU Branches]	Aggregation of risk and client pricing	RGA Enterprise Services Company [United States]	Controller	Policyholders	Policy Details, Personal Characteristics, Occupation / Risk Industry	Health Information
RGA International Reinsurance Company dac [EU Branches]	Checking for potential fraud, sanctions, credit, anti-money	RGA Enterprise Services Company	Processor	Policyholders, Brokers, Beneficiaries	Policy Details, Name and Initials, Personal	Criminal Convictions

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		laundering and other crime	[United States]			Characteristics, Personal Directory Information, Government Issued Identification Numbers, Employment Information	
		RGA UK Services Limited [United Kingdom]	Processor				
		RGA International Corporation [Canada]	Processor				
		RGA Partners Japan GK [Japan]	Processor				
RGA International Reinsurance Company dac [EU Branches]	HR - Employee Management	RGA Enterprise Services Company [United States]	Controller and Processor	Workforce Members	Name and Initials, Employment Information, Education, Personal Characteristics, Government-Issued Identification Numbers, Personal Directory Information, Financial-Related Information, Children Information, Segmentation Attributes	Trade-Union Membership, Biometric Data, Sexual Behavior or Sexual Preference, Genetic Data, Health Data, Criminal Convictions or Offences (only for Ireland, Spain, Netherlands, and Poland), Political Affiliations & Opinions, Racial or Ethnic Origin, Religious or Philosophical Beliefs	
RGA International Reinsurance Company dac [EU Branches]	HR - Recruitment	RGA Enterprise Services Company [United States]	Controller	Workforce Members, Job Applicants	Personal Directory Information, Government-Issued Identification Numbers, Employment Information, Name and Initials,	Criminal Convictions (only for Ireland, Spain, Netherlands, and Poland), Trade Union Membership	
		RGA International Corporation [Canada]	Processor				

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		RGA UK Services Limited [United Kingdom]	Processor		Financial-Related Information, Device Information, Education, Personal Characteristics	
RGA International Reinsurance Company dac [EU Branches]	To facilitate Workforce interactions with others to maintain an interesting and collaborative working environment	RGA Enterprise Services Company [United States]	Controller	Workforce Members	Name and Initials, Employment Information	N/A
		RGA International Corporation [Canada]	Processor			
RGA International Reinsurance Company dac [Spain Branch]	Ensure accuracy of RGA records	RGA Enterprise Services Company [United States]	Processor	Workforce Members	Name and Initials, Employment Information, Government-Issued Identification Numbers, Personal Directory Information	N/A
		RGA International Corporation [Canada]	Processor			
RGA International Reinsurance Company dac [EU Branches]	Reimbursement of Workforce Expenses	RGA Enterprise Services Company [United States]	Processor	Workforce Members, Business Clients	Name and Initials, Personal Directory Information, Employment Information, Financial Information	N/A
		RGA UK Services Limited [United Kingdom]	Processor			
		RGA International Corporation [Canada]	Processor			
RGA International Reinsurance Company dac [EU Branches]	To pay invoice for services rendered	RGA Enterprise Services Company [United States]	Processor	Workforce Members, Business Clients	Name and Initials, Personal Directory Information, Employment Information, Financial Information	N/A
		RGA International Corporation [Canada]	Processor			

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RGA International Reinsurance Company dac [EU Branches]	HR - Payroll	RGA Enterprise Services Company [United States]	Processor	Workforce Members	Name and Initials, Employment Information, Financial Information, Personal Characteristics, Personal Directory Information, Government Issued Identification Numbers, Policy Details, Children Info (Italy)	Trade-Union Membership (Ireland)
		RGA International Corporation [Canada]	Processor			
		RGA UK Services Limited [United Kingdom]	Processor			
RGA International Reinsurance Company dac [EU Branches]	To maintain the security of our premises, systems, facilities, and data	RGA Enterprise Services Company [United States]	Controller	Workforce Members, Business Clients, Office Visitors	Name and Initials, Device Information, Personal Directory Information, Employment Information, Visitor Report / Log, Government-Issued Identification Number	N/A
		RGA UK Services Limited [United Kingdom]	Controller and Processor			
		RGA Technology Partners, Inc. [United States]	Controller			
		RGA International Corporation [Canada]	Processor			
RGA International Reinsurance Company dac [EU Branches]	Administration of Industry Training	RGA Enterprise Services Company [United States]	Processor	Business Clients, Workforce Members	Name and Initials, Employment Information, Personal Directory Information, Personal Characteristics	N/A
		RGA Reinsurance Company [United States]	Controller			
		RGA International Corporation [Canada]	Processor			

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RGA International Reinsurance Company dac [EU Branches]	Marketing of products, services and events	RGA Enterprise Services Company [United States]	Controller	Consumers, Potential Business Clients, Business Clients, Workforce Members	Personal Directory Information, Opt In / Opt Out, Name and Initials, Employment Information, Device Information	N/A
		RGA International Corporation [Canada]	Controller			
		RGA Reinsurance Company [United States]	Controller			
RGA International Reinsurance Company dac [EU Branches]	Underwriting of Insurance Policies	RGA Enterprise Services Company [United States]	Processor	Policyholders	Employment Information, Personal Characteristics, Personal Directory Information, Name and Initials, Policy Details, Financial Related Information, Segmentation Attributes, Government Issued Identification Numbers, Children Information, Education	Health Information, Transgender Information, , Genetic Data, Racial or Ethnic Origin, Sexual Behaviour or Sexual Preference, Gender Identity
		RGA UK Services Limited [United Kingdom]	Processor			
		RGA International Corporation [Canada]	Processor			
		RGA International Reinsurance Company dac [Singapore Branch]	Processor			
		RGA Reinsurance Company of Australia Limited [Australia]	Controller			
		RGA Life Reinsurance Company of Canada [Canada]	Processor			
RGA International Reinsurance Company dac [EU Branches]	Create and publish internal and external communications, promotional and	RGA Enterprise Services Company [United States]	Controller	Workforce Members, Office Visitors	Name and Initials, Personal Characteristics, Employment Information,	Racial or Ethnic Origin

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	marketing materials	RGA Reinsurance Company Hong Kong Branch [Hong Kong]	Controller		Photographs, Audio/Video, Personal Directory Information, Device Information	
RGA International Reinsurance Company dac [EU Branches]	To carry out data analysis to improve Platforms, services and applications	RGA Enterprise Services Company [United States] RGA Reinsurance Company [United States]	Controller	Workforce Members, Policyholders, Potential Business Clients, Business Clients	Device Information, Employment Information, Name and Initials, Personal Characteristics, Policy Details, Government-Issued Identification Numbers, Personal Directory Information, Children Information, Financial Related Information	Health Information

Change Log

Date	Change
Oct 2024	Initial version
May 2025	<p>Various changes made to the following columns based on RoPA updates:</p> <ul style="list-style-type: none">• From RGA (EEA) Entity [Country]• To RGA (Non-EEA Entity [Country])• Data Subject Categories• Data Elements – Personal Data• Data Elements – Special Category Personal Data• Data Elements – Criminal Data <p>Added new Purposes:</p> <ul style="list-style-type: none">• Create and publish internal and external communications, promotional and marketing materials• To carry out data analysis to improve platforms, services and applications (new purpose) <p>Added local legal references when using criminal convictions for the following purposes:</p> <ul style="list-style-type: none">○ Performance of Background Checks for Employment Purposes○ HR – Recruitment○ HR – Employee Management

