

May 2025

GLOBAL BINDING CORPORATE RULES (EU)

APPENDIX 2

DATA SUBJECT RIGHTS PROCEDURE (PROCESSOR)



1. Introduction

- 1.1.1. RGA's "Binding Corporate Rules: Controller Policy" and "Binding Corporate Rules: Processor Policy" (together the "**Policies**" or, respectively, the "**Controller Policy**" and the "**Processor Policy**") safeguard Personal Information transferred between RGA's BCR members ("**BCR Members**").
- 1.2. Individuals whose Personal Information are processed by RGA under the Policies have certain data protection rights, which they may exercise by making a request to the Controller of their information (a "**Request**").
- 1.3. This Binding Corporate Rules: Data Subject Rights Procedure (Processor) ("**Procedure**") describes how RGA will respond to any Requests received from individuals whose Personal Information are Processed and transferred under the Processor Policy.

2. Data subjects' data protection rights

- 2.1. RGA must assist the Controller with its obligations to respond to individuals wishing to exercise the following data protection rights, consistent with the requirements of Applicable Data Protection Laws:
 - 2.1.1. **Right to information:** This is the right for individuals to obtain confirmation as to whether or not Personal Information concerning them are being Processed;
 - 2.1.2. **Right of access:** This is the right for individuals to obtain confirmation whether a Controller Processes Personal Information about them and, if so, to be provided with details of that Personal Information and access to it in an intelligible form;
 - 2.1.3. **Right to rectification:** This is the right for individuals to obtain rectification without undue delay of inaccurate Personal Information a Controller may process about them;
 - 2.1.4. **Right to erasure:** This is the right for individuals to require a Controller to erase Personal Information about him/her on certain grounds – for example, where the Personal Information is no longer necessary to fulfil the purposes for which it was collected;
 - 2.1.5. **Right to restriction:** This is the right for individuals to require a Controller to restrict Processing of Personal Information about them on certain grounds;
 - 2.1.6. **Right to object:** This is the right for individual to object, on grounds relating to their particular situation, to a Controller's Processing of Personal Information about them, if certain grounds apply;

- 2.1.7. **Right to data portability:** This is the right for individuals to receive Personal Information about them from a Controller in a structured, commonly used and machine-readable format and to transmit that information to another Controller, if certain grounds apply.

3. Responsibility to respond to a Request

- 3.1. The Controller of an individual's Personal Information is primarily responsible for responding to a Request and for helping the individual concerned to exercise his or her rights under Applicable Data Protection Laws.
- 3.2. As such, when an individual contacts RGA to make any Request then where RGA Processes that individual's Personal Information as a Processor on behalf of a Controller under the Processor Policy, RGA must inform the relevant Controller promptly and provide it with reasonable assistance to help the individual to exercise his or her rights in accordance with the Controller's duties under Applicable Data Protection Laws.

4. Initial assessment of a Request

- 4.1. Upon receiving any Request from an individual, RGA will ensure all such Requests are immediately routed to the Data Protection Team at dsr@rgare.com. The Data Protection Team (consisting of the regional compliance functions) will document the date on which such Request was received together with any other information that may assist the Data Protection Team in dealing with the Request.
- 4.2. The Data Protection Team will make an initial assessment of the Request as follows:
- 4.2.1. the Data Protection Team will determine whether RGA is a Controller or Processor of the Personal Information that is the subject of the Request; and
- 4.2.2. where Data Protection Team determines that RGA is a Processor of the Personal Information on behalf of a Controller, it shall pass the Request promptly to the relevant Controller in accordance with its contract terms with that Controller and will not respond to the Request directly unless authorised to do so by the Controller.

5. Requests for access to Personal Information

- 5.1. Overview

5.1.1. An individual has the right to obtain confirmation from the Controller as to whether or not Personal Information concerning him or her are being Processed, and, where that is the case, access to the Personal Information and the following information:

- a) the purposes of the Processing;
- b) the categories of Personal Information concerned;
- c) the Recipients or categories of Recipients to whom the Personal Information have been or will be disclosed, in particular, Recipients outside the EEA;
- d) where possible, the envisaged period for which the Personal Information will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the Right to Request from the Controller rectification or erasure of Personal Information, or restriction of Processing of Personal Information concerning him or her, or to object to such Processing;
- f) notification regarding rectification or erasure or restriction
- g) the right to lodge a complaint with a Supervisory Authority;
- h) where the Personal Information are not collected from the individual making the Request, any available information as to their source;
- i) the existence of automated decision-making, including Profiling; and
- j) where Personal Information is transferred from the EEA to a country outside of the EEA, the appropriate safeguards that the Controller has put in place relating to such transfers in accordance with Applicable Data Protection Laws.

5.1.2. An individual is also entitled to request a copy of his or her Personal Information from the Controller in intelligible form ("**Access Request**").

5.1.3. The Data Protection Team will engage appropriate RGA Workforce Members for support with handling an Access Request, as required or appropriate.

6. Requests for erasure or rectification of Personal Information, or restriction or cessation of Processing of Personal Information, or data portability

- 6.1. If RGA receives a Request to correct, update, transmit (data portability) or erase Personal Information, or to restrict or cease Processing of an individual's Personal Information, such Request must be passed to the Data Protection Team at dsr@rgare.com immediately to make an initial assessment in accordance with section 4 above.
- 6.2. When RGA rectifies or erases Personal Information on instruction of a Controller when it is acting as a Processor, RGA will notify other BCR Members, sub-processors, or other Recipients to whom the Personal Information has been disclosed accordingly so that they can also update their records, unless this proves impossible or involves disproportionate effort.

7. Questions about this Procedure

- 7.1. All queries relating to this Procedure are to be addressed to RGA's Global Privacy Officer at dsr@rgare.com.

Change Log

Date	Change
October 2021	Added 'EU' to distinguish from UK BCRs
May 2022	Minor typos
Oct 2024	Capitalized terms defined in Definitions section of BCR-P Policy Added right to notification regarding rectification or erasure or restriction Updated 'Group Member' to 'BCR Member' and 'Europe' to 'EEA'
May 2025	Replaced 'Chief Privacy Officer' with 'Global Privacy Officer'

