

May 2025

GLOBAL BINDING CORPORATE RULES (EU)

APPENDIX 8

UPDATING PROCEDURE (PROCESSOR)



1. INTRODUCTION

- 1.1. Reinsurance Group of America Inc.'s ("RGA") "Binding Corporate Rules: Controller Policy" ("Controller Policy") and "Binding Corporate Rules: Processor Policy" ("Processor Policy") (together the "Policies") safeguard Personal Information transferred between the RGA BCR members ("BCR Members"). This Updating Procedure (Processor) sets out the way in which RGA will communicate changes to the Processor Policy to the Lead Supervisory Authority, individual Data Subjects, Controllers and to the BCR Members.
- 1.2. Any reference to RGA in this procedure is to the Global Privacy Office who will ensure that the commitments made by RGA in this Updating Procedure (Processor) are met.

2. MATERIAL AND ADMINISTRATIVE CHANGES TO THE POLICIES

- 2.1. RGA will communicate to the Lead Supervisory Authority in advance any changes to the Policies that would possibly be detrimental to the level of protection offered by the Binding Corporate Rules or significantly affect them, such as changes to the binding character or the liable BCR Members, in order that they may assess whether the changes made require a new approval.
- 2.2. Where a change to the Processor Policy materially affects the conditions under which RGA Processes Personal Information on behalf of a Controller under the terms of its contract with RGA, RGA will also communicate the proposed change to the affected Controller before it is implemented, and with sufficient notice to enable the affected Controller to object. The Controller may then suspend the transfer of Personal Information to RGA and/or terminate the contract, in accordance with the terms of its contract with RGA.
- 2.3. RGA will communicate any changes to the Policies that:
 - 2.3.1. are material (including any modification that would possibly affect the level of protection offered by the Binding Corporate Rules or significantly affect the Binding Corporate Rules including as a result of any change in Applicable Data Protection Laws);
 - 2.3.2. are administrative in nature (including changes in the list of BCR Members); or
 - 2.3.3. have occurred as a result of either a change of Applicable Data Protection Laws in any EEA country or due to any legislative, court or Supervisory Authority measure.
- 2.4. RGA will communicate the changes outlined in Section 2.3 to the following parties:

- 2.4.1. all BCR Members via written notice (which may include e-mail), without undue delay;
- 2.4.2. the Lead Supervisory Authority at least once a year, with a brief explanation of the reasons for any notified changes to the Policies, and
- 2.4.3. Controllers on whose behalf RGA Processes Personal Information and Data Subjects who benefit from the Policies via rgare.com, without undue delay.

2.5. If there are no changes to the Policies, RGA will notify this to the Lead Supervisory Authority once a year.

3. LOGGING CHANGES TO THE POLICIES

- 3.1. The Policies contain a change log which sets out the date each Policy is revised and the details of any revisions made. RGA will maintain an up-to-date list of the changes made to the Policies. This information also will be available to Competent Supervisory Authorities upon request from RGA.
- 3.2. RGA will maintain a fully updated list of BCR Members. This information will be available on request from RGA.
- 3.3. RGA will maintain and update a list of the sub-processors appointed by RGA to Process Personal Information on behalf of a Controller. This information will be available on request from RGA.

4. NEW BCR MEMBERS

- 4.1. RGA will ensure that all new BCR Members are bound by and have implemented the Policies before a transfer of Personal Information to them takes place.

5. TERMINATING BCR MEMBERS

- 5.1. RGA will ensure that any BCR Members no longer bound by the Policies either return or delete the personal data received under the Policies, or if on leaving the Group, the BCR Member must keep the data for legal or regulatory reasons, the former BCR Member will ensure protection is maintained in accordance with Chapter V EU GDPR.

Change Log

Date	Change
October 2021	Added 'EU' to distinguish from UK BCRs
May 2022	No updates – date refresh only
Oct 2024	<p>Capitalized terms defined in Definitions section of BCR-C Policy</p> <p>Noted that RGA will communicate to the Lead Supervisory Authority in advance any changes to the Policies that would possibly be detrimental to the level of protection offered by the Binding Corporate Rules or significantly affect them</p> <p>Noted that if there are no changes to the Policies, RGA will update the Lead Supervisory Authority once a year</p> <p>Noted that RGA will make available to Data Subjects, without undue delay, any changes, via rgare.com</p> <p>Clarified timeframes that RGA will communicate updates</p> <p>Noted that change logs for the Policies are available to the Competent Supervisory Authorities upon request from RGA</p> <p>Noted requirements for terminating BCR Members</p> <p>Condensed and reorganized Appendix to eliminate redundancy and increase clarity</p> <p>Updated "Group Member" to "BCR Member" and "Data Protection Authority" to "Supervisory Authority"</p>
May 2025	Updated "Chief Privacy Officer" to "Global Privacy Office"

