

May 2025

GLOBAL BINDING CORPORATE RULES (EU)

APPENDIX 9

LAW ENFORCEMENT DATA ACCESS PROCEDURE (PROCESSOR)



## 1. INTRODUCTION

- 1.1. This Binding Corporate Rules: Law Enforcement Data Access Procedure (Processor) sets out Reinsurance Group of America Inc.'s ("RGA") policy for the RGA Group to responding to a request received from a law enforcement or other government authority (together the "Requesting Authority") to disclose Personal Information Processed by RGA on behalf of a Controller (hereafter "Data Production Request").
- 1.2. Where RGA receives a Data Production Request, it will handle that Data Production Request in accordance with this Procedure.
- 1.3. To the extent Applicable Data Protection Law(s) require a higher standard of protection for Personal Information than is required by this Procedure, RGA will comply with the relevant requirements of Applicable Data Protection Law(s).

## 2. GENERAL PRINCIPLE ON DATA PRODUCTION REQUESTS

- 2.1. As a general principle, RGA does not disclose Personal Information in response to a Data Production Request unless either:
  - 2.1.1. it is under a compelling legal obligation to make such disclosure; or
  - 2.1.2. taking into account the circumstances and the privacy rights of any affected individuals, there is an imminent risk of serious harm that merits disclosure in any event.
- 2.2. Even where disclosure is required, RGA's policy is that the Controller should have the opportunity to protect the Personal Information requested because it has the greatest interest in opposing, or is in the better position to comply with, a Data Production Request.
  - 2.2.1. For that reason, unless it is legally compelled to do so or there is an imminent risk of serious harm, RGA will first provide the Controller with details of the Data Production Request and possibly consult with the Competent Supervisory Authorities. RGA will cooperate with the Controller to address the Data Production Request.

## 3. DATA PRODUCTION REQUEST REVIEW

- 3.1. Receipt of a Data Production Request

- 3.1.1. If a RGA BCR Member receives a Data Production Request, the recipient of the request must pass it to RGA's Global Privacy Officer immediately upon receipt, indicating the date on which it was received together with any other information, which may assist RGA's Global Privacy Officer to deal with the request.
- 3.1.2. The request does not have to be in writing, made under a Court order, or mention data protection law to qualify as a Data Production Request.

### 3.2. Initial steps

- 3.2.1. RGA's Global Privacy Officer will carefully review each Data Production Request individually and on a case-by-case basis. RGA's Global Privacy Officer will liaise with RGA's Global Legal Services as appropriate to determine the nature, urgency, scope, and validity of the Data Production Request under applicable laws and to determine what lawful actions must be taken in response to the Request, including whether to challenge the Data Production Request.

## 4. NOTICE OF A DATA PRODUCTION REQUEST

### 4.1. Notice to the Controller

- 4.1.1. After assessing the nature, urgency, scope, and validity of the Data Protection Request, RGA will notify and provide the Controller with the details of the Data Production Request prior to disclosing any Personal Information, unless legally prohibited or where the imminent risk of serious harm prohibits prior notification.

### 4.2. Consultation with the Competent Supervisory Authorities

- 4.2.1. Where legally prohibited from informing the Controller or where the imminent risk of serious harm prohibits prior notification, RGA may also consult with the Competent Supervisory Authorities.
- 4.2.2. RGA will use its best efforts (taking into account the nature, urgency, scope and validity of the request) to inform the Requesting Authority about its obligations under Applicable Data Protection Laws and to obtain the right to waive this prohibition. Such efforts may include asking the Requesting Authority to put the request on hold so RGA can consult with the Competent Supervisory Authorities, which in appropriate circumstances, may include seeking a court order to this effect. RGA will maintain a written record of the efforts it takes.

Change Log

Date	Change
October 2021	Added 'EU' to distinguish from UK BCRs
May 2022	No updates – date refresh only
Oct 2024	Updated "Group Member" to "BCR Member" and "Data Protection Authority" to "Supervisory Authority" Adjusted to reflect that notification to or consultation with the Competent Supervisory Authority is possible but no longer required, including removal of "Transparency Reports" section
May 2025	Updated "Chief Privacy Officer" to "Global Privacy Officer"