



**August 2025**

**BINDING CORPORATE RULES (UK):  
APPENDIX 9  
IN SCOPE DATA TRANSFERS (UK) (CONTROLLER)**

## In scope data transfers:

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

**Note:** Some recipient RGA entities listed here may be established in jurisdictions currently deemed Adequate by the UK. 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 UK Adequacy status \*could\* change for some entities in which case these Binding Corporate Rules will become the transfer mechanism).

| From RGA (UK) Entity    | Purpose for BCR / After Transfer   | To RGA (Non-UK) Entity [Country]            | RGA (Non-UK) Entity acting as... | Data Subject Categories  | Data Elements - Personal Data   | Data Elements - Special Category Personal Data   |
|-------------------------|--|---|----------------------------------|--|---|--|
| RGA UK Services Limited | Business Development   | RGA International [EU Branches]             | Controller                       | Business Clients (business partners, external third parties, business customers), Potential Business Clients | Employment Information, Name and Initials, Personal Directory Information, Other Sensitive Personal Information                           | -  |
|                         |  | RGA Partnerships LLC [United States]        | Controller                       |  |   |  |
|                         |  | RGA Enterprise Services [United States]     | Controller                       |  |   |  |
| RGA UK Services Limited | Management of RGA events for attendees                                   | RGA International Corporation [Canada]      | Processor                        | Business Clients (business partners, external third parties, business customers)                             | Employment Information, Personal Health Information, Name and Initials, Personal Directory Information                                    | -  |
|                         |  | RGA Enterprise Services [United States]     | Processor                        |  |   |  |
| RGA UK Services Limited | HR - Recruitment (Human Resources Recruitment Diversity Data Monitoring) | RGA International [EU & Singapore Branches] | Controller                       | Workforce Members (includes contractors, consultants & ex-employees), Job Applicants                         | Name and initials, Personal Characteristics, Government-Issues Identifiers, Personal Directory Information, Education, Device Information | Racial or Ethnic Origin, Religious or Philosophical Beliefs, Sexual Behaviour or Sexual Preferences, Health Data |
|                         |  | RGA Enterprise Services [United States]     | Controller                       |  |   |  |

|                         |                          |   |                          |  |   |   |
|-------------------------|--------------------------|---|--------------------------|--|---|---|
| RGA UK Services Limited | HR - Employee Management | RGA International [EU Branches]         | Controller               | Workforce Members (includes contractors, consultants & ex-employees)           | Name and Initials, Employment Information, Personal Health Information, Education, Children Information, Personal Characteristics, Government Identification Numbers, Financial-Related Information, Other Sensitive Personal Information, Device Information, Segmentation Attributes, Personal Directory Information, Credit Card Information | Health Data, Data Concerning Criminal Convictions or Offences, Data Revealing Racial or Ethnic Origin |
|                         |                          | RGA Enterprise Services [United States] | Controller and Processor |  |   |   |
|                         |                          | RGA International Corporation [Canada]  | Processor                |  |   |   |
| RGA UK Services Limited | HR - Training            | RGA Enterprise Services [United States] | Controller               | Workforce Members (includes contractors, consultants & ex-employees)           | Name and Initials, Employment Information, Personal Directory Information, Personal Characteristics   | -   |
| RGA UK Services Limited | HR - Benefits            | RGA Enterprise Services [United States] | Processor                | Workforce Members (includes contractors, consultants & ex-employees), Children | Name and Initials, Personal Directory Information, Employment Information, Children Information, Personal Characteristics, Device Information, Government-Issued Identification Numbers, Financial Related Information  | -   |
|                         |                          | RGA International Corporation [Canada]  | Processor                |  |   |   |
| RGA UK Services Limited | HR - Terminations        | RGA Enterprise Services [United States] | Controller               | Workforce Members (includes contractors, consultants & ex-employees)           | Personal Characteristics, Personal Directory Information  | -   |
| RGA UK Services Limited | HR - Payroll             | RGA International Corporate [Canada]    | Processor                | Workforce Members (includes contractors, consultants & ex-employees)           | Financial-Related Information, Employment Information, Personal Characteristics, Name and Initials, Personal Directory Information, Government Issued Identification Numbers  | -   |

|                         |                                    |  |               |   |   |   |
|-------------------------|------------------------------------|--|---------------|---|---|---|
| RGA UK Services Limited | HR – Background Checks             | RGA International Corporate <b>[Canada]</b>            | Processor     | Job Applicants, Workforce Members (includes contractors, consultants & ex-employees)  | Education, Other Sensitive Personal Information, Employment Information, Financial-Related Information, Name and Initials, Personal Directory Information                                 | Data Concerning Criminal Convictions or Offences  |
| RGA UK Services Limited | HR – Regulatory Compliance         | RGA International Corporation <b>[Canada]</b>          | Processor     | Workforce Members (includes contractors, consultants & ex-employees)  | Employment Information, Name and Initials, Personal Directory Information   | Health Data   |
| RGA UK Services Limited | To manage expenses                 | RGA Enterprise Services Company <b>[United States]</b> | Processor     | Policyholders / Insured Parties (ceding companies), Workforce Members (includes contractors, consultants & ex-employees)                                      | Policy Details, Employment Information, Personal Characteristics, Name and Initials   |   |
| RGA UK Services Limited | Regulatory Compliance              | RGA Enterprise Services <b>[United States]</b>         | Controller    | Workforce Members (includes contractors, consultants & ex-employees); Job Applicants; Policyholder/Insured Parties (ceding companies), Beneficiaries, Brokers | Name, Employment Information, Education, Government Identifiers, Other Sensitive Information, Personal Characteristics, Personal Directory Information, Employment Information            | Data Concerning Criminal Convictions or Offences, Biometric Data Used to Identify an Individual (e.g., fingerprints, DNA, retinal scan, etc.) |
| RGA UK Services Limited | Underwriting of Insurance Policies | RGA International <b>[EU Branches]</b>                 | Controller    | Policyholders / Insured Parties (ceding companies), Consumers (non-policyholders)   | Children Information, Personal Characteristics, Government-Issued Identification Numbers, Financial-Related Information, Credit Card Information, Policy Details, Employment Information, | Data Revealing Racial or Ethnic Origin, Health Data, Data Concerning  |
|                         |                                    | RGA Technology Partners <b>[United States]</b>         | Sub-Processor |   |   |   |

|                         |                                 |   |            |   |   |                                  |
|-------------------------|---------------------------------|---|------------|---|---|----------------------------------|
|                         |                                 | RGA Enterprise Services [United States]                     | Processor  |   | Other Sensitive Personal Information, Education, Personal Directory Information, Personal Health Information, Segmentation Attributes, Name and Initials, Personal Characteristics  | Criminal Convictions or Offences |
| RGA UK Services Limited | Research & Development          | RGA International Reinsurance Company DAC [Ireland]         | Controller | Consumers (non-policyholders), Policyholders / Insured Parties (ceding companies) | Personal Characteristics, Children Information, Employment Information, Education, Personal Health Information, Segmentation Attributes, Name and Initials, Financial-Related Information, Policy Details, Government-Issued Identification Numbers, Personal Directory Information | Health Data                      |
|                         |                                 | RGA Americas Reinsurance Company [Bermuda]                  | Controller |   |   |                                  |
|                         |                                 | RGA Enterprise Services [United States]                     | Processor  |   |   |                                  |
|                         |                                 | RGA International Corporation [Canada]                      | Processor  |   |   |                                  |
|                         |                                 | RGA Americas Reinsurance Company, LTD., South Africa Branch | Processor  |   |   |                                  |
|                         |                                 | RGA Reinsurance Company [United States]                     | Controller |   |   |                                  |
| RGA UK Services Limited | Legal                           | RGA Enterprise Services [United States]                     | Controller | Senior Level Executives   | Name and initials, Employment information, Financial-Related Information  | -                                |
|                         |                                 | REINSURANCE GROUP OF AMERICA, INCORPORATED [United States]  | Controller |   |   |                                  |
| RGA UK Services Limited | Valuation of Insurance Policies | RGA International Reinsurance Company DAC [Ireland]         | Controller | Policyholders / Insured Parties (ceding companies), Beneficiaries                 | Policy Details, Personal Characteristics, Personal Directory Information, Children Information, Financial-Related Information, Name and Initials, Government-Issued Identification Numbers  | Health Data                      |
|                         |                                 | RGA International Corporation [Canada]                      | Processor  |   |   |                                  |

|                         |  |  |   |   |  |             |
|-------------------------|--|--|---|---|--|-------------|
|                         |  | RGA Enterprise Services [ <b>United States</b> ]             | Controller (Non-traditional business) & Processor |   |  |             |
| RGA UK Services Limited | Assess Risk of Lifetime Mortgage Portfolio | RGA International Corporation [ <b>Canada</b> ]              | Processor   | Consumers (non-policy holders), Borrows (lenders)   | Personal Directory Information, Personal Characteristics, Policy Details, Name and Initials, Financial Account Information   | -           |
|                         |  | RGA Enterprise Services Company [ <b>United States</b> ]     | Processor   |   |  |             |
| RGA UK Services Limited | Marketing                                  | RGA International [ <b>EU &amp; Singapore Branches</b> ]     | Controller  | Business Clients (business partners, external third parties, business customers), Consumers (non-policyholders), Potential Business Clients | Personal Directory Information, Employment Information, Device Information, Other Sensitive Personal Information, Name and Initials                                    | -           |
|                         |  | RGA International Corporation [ <b>Canada</b> ]              | Controller  |   |  |             |
|                         |  | RGA Reinsurance Company ( <b>all branches</b> )              | Controller  |   |  |             |
|                         |  | RGA Partnerships LLC [ <b>United States</b> ]                | Controller  |   |  |             |
|                         |  | RGA Enterprise Services [ <b>United States</b> ]             | Controller  |   |  |             |
| RGA UK Services Limited | Retrocession                               | RGA International Reinsurance Company DAC [ <b>Ireland</b> ] | Controller  | Policyholders / Insured Parties (ceding companies)  | Personal Characteristics, Name and Initials, Children Information, Personal Health Information, Policy Details   | Health data |
|                         |  | RGA Reinsurance Company [ <b>United States</b> ]             | Controller  |   |  |             |
| RGA UK Services Limited | Administration of Insurance Policies       | RGA Life Reinsurance Company of Canada [ <b>Canada</b> ]     | Controller  | Policyholders / Insured Parties (ceding companies), Beneficiaries   | Policy Details, Personal Directory Information, Personal Characteristics, Employment Information, Name and initials, Personal Health Information, Children Information | Health Data |
|                         |  | RGA International Corporation [ <b>Canada</b> ]              | Processor   |   |  |             |

|                         |  |   |            |  |   |             |
|-------------------------|--|---|------------|--|---|-------------|
|                         |  | RGA Enterprise Services Company<br>[United States]  | Processor  |  |   |             |
|                         |  | RGA Americas Reinsurance Company, Ltd.<br>[Bermuda]   | Controller |  |   |             |
| RGA UK Services Limited | Administration of Reinsurance Products | RGA International Reinsurance Company Designated Activity Company<br>[Ireland]                    | Controller | Policyholders / Insured Parties (ceding companies) | Personal Characteristics, Policy Details, Name and Initials, Personal Directory Information, Employment Information | -           |
|                         |  | RGA International Reinsurance Company dac, Branch Office for The Netherlands<br>[The Netherlands] | Controller |  |   |             |
|                         |  | RGA Americas Reinsurance Company, Ltd.<br>[Bermuda]   | Controller |  |   |             |
|                         |  | RGA Life Reinsurance Company of Canada<br>[Canada]  | Processor  |  |   |             |
|                         |  | RGA International Corporation<br>[Canada]   | Processor  |  |   |             |
|                         |  | RGA Enterprise Services Company<br>[United States]  | Processor  |  |   |             |
| RGA UK Services Limited | Adjudication of claims                 | RGA International Reinsurance Company dac Italian Branch<br>[Italy]                               | Processor  | Policyholders / Insured Parties (ceding companies) | Personal Characteristics, Policy Details, Personal Health Information, Personal Directory Information               | Health Data |
|                         |  | RGA Global Reinsurance Company, Ltd.,   | Processor  |  |   |             |

|                               |                                      |   |            |   |  |             |
|-------------------------------|--------------------------------------|---|------------|---|--|-------------|
|                               |                                      | Labuan Branch<br>[Malaysia]   |            |   |  |             |
|                               |                                      | RGA<br>Reinsurance<br>Company<br>Middle East<br>Limited [United<br>Arab Emirates]         | Processor  |   |  |             |
|                               |                                      | RGA Americas<br>Reinsurance<br>Company, LTD.,<br>South Africa<br>Branch [South<br>Africa] | Processor  |   |  |             |
|                               |                                      | RGA<br>Reinsurance<br>Company<br>Oficina de<br>Representación<br>en México<br>[Mexico]    | Processor  |   |  |             |
| RGA UK<br>Services<br>Limited | Claims<br>Handling                   | RGA<br>International<br>Reinsurance<br>Company DAC<br>[Ireland]                           | Controller | Policyholders /<br>Insured Parties<br>(ceding<br>companies)                   | Government Issued<br>Identification Numbers,<br>Personal Characteristics,<br>Personal Directory<br>Information, Employment<br>Information, Financial-<br>Related Information,<br>Children Information,<br>Personal Health<br>Information, Policy Details | Health Data |
|                               |                                      | RGA Enterprise<br>Services<br>Company<br>[United States]                                  | Processor  |   |  |             |
| RGA UK<br>Services<br>Limited | Pricing for<br>Insurance<br>Policies | RGA<br>International<br>Reinsurance<br>Company DAC<br>[Ireland]                           | Controller | Policyholders /<br>Insured Parties<br>(ceding<br>companies),<br>Beneficiaries | Personal Characteristics,<br>Policy Details, Personal<br>Directory Information,<br>Employment Information  | -           |
|                               |                                      | RGA<br>International<br>Reinsurance<br>Company DAC,<br>Singapore<br>Branch<br>[Singapore] | Controller |   |  |             |
|                               |                                      | RGA<br>International<br>Corporation<br>[Canada]   | Controller |   |  |             |
|                               |                                      | RGA<br>Reinsurance<br>Company<br>[United States]  | Controller |   |  |             |

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|                               |                         | RGA Americas<br>Reinsurance<br>Company<br>[Bermuda]              | Controller |   |   |             |
| RGA UK<br>Services<br>Limited | Event<br>Management     | RGA Enterprise<br>Services [United<br>States]                    | Controller | Business<br>Clients<br>(business<br>partners,<br>external third<br>parties,<br>business<br>customers),<br>Consumers<br>(non-<br>policyholders),<br>Potential<br>Business<br>Clients,<br>Workforce<br>Members<br>(includes<br>contractors,<br>consultants &<br>ex-employees) | Personal Directory<br>Information, Employment<br>Information, Device<br>Information, Other<br>Sensitive Personal<br>Information, Name and<br>Initials, Personal<br>Characteristics  | -           |
| RGA UK<br>Services<br>Limited | Physical<br>Security    | RGA Enterprise<br>Services [United<br>States]                    | Controller | Workforce<br>Members<br>(includes<br>contractors,<br>consultants &<br>ex-employees),<br>Office Visitors,<br>Children  | Audio/Visual  | -           |
| RGA UK<br>Services<br>Limited | Device<br>Management    | RGA Enterprise<br>Services [United<br>States]                    | Controller | Workforce<br>Members<br>(includes<br>contractors,<br>consultants &<br>ex-employees)   | Name and Initials, Device<br>Information, Personal<br>Directory Information   | -           |
| RGA UK<br>Services<br>Limited | Data Loss<br>Prevention | RGA Enterprise<br>Services [United<br>States]                    | Controller | Workforce<br>Members<br>(includes<br>contractors,<br>consultants &<br>ex-employees)   | Device Information,<br>Personal Directory<br>Information  | -           |
| RGA UK<br>Services<br>Limited | Audit                   | RGA Enterprise<br>Services [United<br>States]                    | Controller | Policyholders /<br>Insured Parties<br>(ceding<br>companies),<br>Workforce<br>Members<br>(includes<br>contractors,<br>consultants &<br>ex-employees),  | Personal Characteristics,<br>Credit Card Information,<br>Employment Information,<br>Education, Name and<br>Initials, Personal Directory<br>Information, Financial-<br>Related Information, Policy<br>Details, Device Information,<br>Personal Health<br>Information | Health Data |
|                               |                         | RGA<br>Reinsurance<br>Company Hong<br>Kong Branch<br>[Hong Kong] | Controller | Workforce<br>Members<br>(includes<br>contractors,<br>consultants &<br>ex-employees),  |   |             |

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|---|--|---|------------|--|---|-------------|
|   |  | RGA<br>Reinsurance<br>Company of<br>Australia<br>Limited<br>[Australia] | Controller | Job Applicants.<br>Beneficiaries   |   |             |
| RGA<br>International<br>Reinsurance<br>Company<br>DAC, U.K.<br>Branch<br>Office | Business<br>Development                    | RGA<br>International<br>[EU Branches]                                   | Controller | Business<br>Clients<br>(business<br>partners,<br>external third<br>parties,<br>business<br>customers),<br>Potential<br>Business<br>Clients | Employment Information,<br>Name and Initials, Personal<br>Directory Information,<br>Other Sensitive Personal<br>Information, Children<br>Information, Government-<br>Issued Identification<br>Number, Device<br>Information | -           |
|   |  | RGA Enterprise<br>Service<br>Company<br>[United States]                 | Controller |  |   |             |
| RGA<br>International<br>Reinsurance<br>Company<br>DAC, U.K.<br>Branch<br>Office | Administration<br>of Insurance<br>Policies | RGA Enterprise<br>Services<br>Company<br>[United States]                | Processor  | Policyholders /<br>Insured Parties<br>(ceding<br>companies)  | Policy Details, Personal<br>Directory Information,<br>Personal Characteristics,<br>Employment Information,<br>Name and initials,<br>Employment Information,<br>Personal Health<br>Information, Children<br>Information      | Health Data |
|   |  | RGA<br>International<br>Corporation<br>[Canada]                         | Processor  |  |   |             |
| RGA<br>International<br>Reinsurance<br>Company<br>DAC, U.K.<br>Branch<br>Office | Underwriting<br>of Insurance<br>Policies   | RGA<br>International<br>Reinsurance<br>Company DAC<br>[Ireland]         | Controller | Policyholders /<br>Insured Parties<br>(ceding<br>companies)  | Personal Health<br>Information, Personal<br>Characteristics, Personal<br>Directory Information,<br>Financial-Related<br>Information, Name and<br>Initials, Government-Issued<br>Identification Numbers                      | Health Data |
|   |  | RGA Enterprise<br>Services<br>Company<br>[United States]                | Processor  |  |   |             |

|   |                                |  |            |   |   |   |
|---|--------------------------------|--|------------|---|---|---|
| RGA International Reinsurance Company DAC, U.K. Branch Office | Marketing                      | RGA International <b>[EU &amp; Singapore Branches]</b> | Controller | Business Clients (business partners, external third parties, business customers), Consumers (non-policyholders), Potential Business Clients | Personal Directory Information, Employment Information, Device Information, Other Sensitive Personal Information, Name and Initials | - |
|   |                                | RGA International Corporation <b>[Canada]</b>          | Controller |   |   |   |
|   |                                | RGA Reinsurance Company <b>(all branches)</b>          | Controller |   |   |   |
|   |                                | RGA Partnerships LLC <b>[United States]</b>            | Controller |   |   |   |
| RGA International Reinsurance Company DAC, U.K. Branch Office | Pricing for Insurance Policies | RGA International Corporation <b>[Canada]</b>          | Controller | Policyholders / Insured Parties (ceding companies), Beneficiaries   | Personal Characteristics, Policy Details, Employment Information, Personal Directory Information                                    | - |
|   |                                | RGA International <b>[EU &amp; Singapore Branches]</b> | Controller |   |   |   |
|   |                                | RGA Americas Reinsurance Company <b>[Bermuda]</b>      | Controller |   |   |   |
|   |                                | RGA Reinsurance Company <b>[United States]</b>         | Controller |   |   |   |

|   |                                 |   |            |   |  |   |
|---|---------------------------------|---|------------|---|--|---|
| RGA International Reinsurance Company DAC, U.K. Branch Office | Regulatory Compliance           | RGA Enterprise Services [United States]                           | Controller | Workforce Members (includes contractors, consultants & ex-employees); Job Applicants; Policyholder/Insured Parties (ceding companies), Beneficiaries, Brokers | Name, Employment Information, Education, Government Identifiers, Other Sensitive Information, Personal Characteristics, Personal Directory Information, Employment Information   | Data Concerning Criminal Convictions or Offences, Biometric Data Used to Identify an Individual (e.g., fingerprints, DNA, retinal scan, etc.) |
|   |                                 | RGA International [EU & Singapore Branches]                       | Controller |   |  |   |
| RGA International Reinsurance Company DAC, U.K. Branch Office | Claims Handling                 | RGA International Reinsurance Company DAC [Ireland]               | Controller | Policyholders / Insured Parties (ceding companies)  | Government Issued Identification Numbers, Personal Characteristics, Personal Directory Information, Employment Information, Financial-Related Information, Children Information, Personal Health Information, Policy Details | Health Data   |
|   |                                 | RGA Enterprise Services Company [United States]                   | Processor  |   |  |   |
| RGA International Reinsurance Company DAC, U.K. Branch Office | Valuation of Insurance Policies | RGA Enterprise Services Company [United States]                   | Processor  | Policyholders / Insured Parties (ceding companies), Beneficiaries   | Policy Details, Personal Characteristics, Children Information, Personal Health Information  | Health Data   |
|   |                                 | RGA International Corporation [Canada]                            | Processor  |   |  |   |
| OMNILIFE INSURANCE COMPANY LIMITED                            | Regulatory Compliance           | RGA Enterprise Services [United States]                           | Processor  | Workforce Members (includes contractors, consultants & ex-employees); Job Applicants; Policyholder/Insured Parties (ceding companies), Beneficiaries, Brokers | Name, Employment Information, Education, Government Identifiers, Other Sensitive Information, Personal Characteristics, Personal Directory Information, Employment Information   | Data Concerning Criminal Convictions or Offences, Biometric Data Used to Identify an Individual (e.g., fingerprints, DNA, retinal scan, etc.) |
|   |                                 | RGA International Corporation [Canada]                            | Processor  |   |  |   |
|   |                                 | RGA INTERNATIONAL REINSURANCE COMPANY DESIGNATED ACTIVITY COMPANY | Processor  |   |  |   |

|   |  |   |            |  |  |             |
|---|--|---|------------|--|--|-------------|
| OMNILIFE<br>INSURANCE<br>COMPANY<br>LIMITED | Claims<br>Handling                         | RGA<br>International<br>Reinsurance<br>Company DAC<br>[Ireland] | Controller | Policyholders /<br>Insured Parties<br>(direct<br>business),<br>Beneficiaries         | Personal Characteristics,<br>Personal Health<br>Information, Policy Details,<br>Employment Information,<br>Government-Issued<br>Identification Numbers,<br>Name and Initials, Personal<br>Directory Information,<br>Financial-Related<br>Information, Other<br>Sensitive Personal<br>Information | Health Data |
|   |  | RGA<br>International<br>Corporation<br>[Canada]                 | Processor  |  |  |             |
| OMNILIFE<br>INSURANCE<br>COMPANY<br>LIMITED | Administration<br>of Insurance<br>Policies | RGA<br>International<br>Reinsurance<br>Company DAC<br>[Ireland] | Controller | Policyholders /<br>Insured Parties<br>(direct<br>business),<br>Beneficiaries         | Policy Details, Personal<br>Health Information,<br>Personal Characteristics,<br>Employment Information,<br>Policy Details, Name and<br>initials, Government Issued<br>Identification Numbers   | Health Data |
|   |  | RGA<br>International<br>Corporation<br>[Canada]                 | Processor  |  |  |             |
| OMNILIFE<br>INSURANCE<br>COMPANY<br>LIMITED | Valuation of<br>Annuities                  | RGA<br>International<br>Corporation<br>[Canada]                 | Processor  | Policyholders /<br>Insured Parties<br>(direct<br>business)                           | Personal Characteristics,<br>Financial-Related<br>Information, Name and<br>Initials, Personal Directory<br>Information, Policy Details   | -           |
| OMNILIFE<br>INSURANCE<br>COMPANY<br>LIMITED | Valuation of<br>Lifetime<br>Mortgages      | RGA<br>International<br>Corporation<br>[Canada]                 | Processor  | Policyholders /<br>Insured Parties<br>(ceding<br>companies),<br>Borrows<br>(lenders) | Policy Details, Personal<br>Characteristics, Name and<br>Initials, Personal Directory<br>Information, Segmentation<br>Attributes   | -           |
|   |  | RGA<br>ENTERPRISE<br>SERVICES<br>COMPANY                        | Processor  |  |  |             |
| OMNILIFE<br>INSURANCE<br>COMPANY<br>LIMITED | Reinsurance                                | RGA<br>International<br>Corporation<br>[Canada]                 | Processor  | Policyholders /<br>Insured Parties<br>(direct<br>business)                           | Personal Characteristics,<br>Name and Initials, Policy<br>Details, Personal Health<br>Information, Employment<br>Information, Financial-<br>Related Information,<br>Personal Directory<br>Information  | -           |
|   |  | Tindall<br>Associates,<br>Inc. [United<br>States]               | Processor  |  |  |             |
|   |  | RGA Americas<br>Reinsurance<br>Company,                         | Controller |  |  |             |

|   |   |  |            |   |   |   |
|---|---|--|------------|---|---|---|
|   |   | Ltd.<br>[Bermuda]  |            |   |   |   |
| OMNILIFE<br>INSURANCE<br>COMPANY<br>LIMITED   | Assess Risk of<br>Lifetime<br>Mortgage<br>Portfolio | RGA<br>International<br>Corporation<br>[Canada]                | Processor  | Borrows<br>(lenders)  | Policy Details,<br>Segmentation Attributes,<br>Personal Characteristics   | -   |
|   |   | RGA<br>Enterprise<br>Services<br>Company<br>[United<br>States] | Processor  |   |   |   |
|   |   | RGA<br>Investment<br>Advisors LLC<br>[United<br>States]        | Processor  |   |   |   |
| Hodge Life<br>Assurance<br>Company<br>Limited | Regulatory<br>Compliance                            | RGA<br>Enterprise<br>Services<br>[United<br>States]            | Controller | Workforce<br>Members<br>(includes<br>contractors,<br>consultants &<br>ex-employees) | Name and Initials,<br>Employment Information,<br>Education, Government-<br>Issued Identification<br>Number, Personal<br>Characteristics, Education,<br>Personal Directory<br>Information, | Data Concerning<br>Criminal<br>Convictions or<br>Offences, Biometric<br>Data Used to<br>Identify an<br>Individual (e.g.,<br>fingerprints, DNA,<br>retinal scan, etc.) |

# CHANGE LOG

| Date     | Version | Change   |
|----------|---------|--|
| Sep 2023 | 1.0     | First (non-Draft) version  |
| Sep 2024 | 1.1     | Update to reflect ROPA changes including: <ul style="list-style-type: none"> <li>• Name change for RGAX LLC to RGA Partnerships LLC</li> <li>• Added, updated, and archived processing activities</li> </ul>   |
| Aug 2025 | 1.2     | <ul style="list-style-type: none"> <li>• Processing transfer entity to “RGA Americas Reinsurance Company, LTD., South Africa Branch” from “RGA Reinsurance Company of South Africa Limited [South Africa]”</li> <li>• Added Data Elements:               <ul style="list-style-type: none"> <li>◦ RGA UK Limited Services entity purpose of Valuation of Insurance Policies.</li> <li>◦ RGA UK Limited Services entity purpose of Retrocession.</li> </ul> </li> <li>• RGA International Reinsurance Company DAC, U.K. Branch Office entity purpose of Business Development               <ul style="list-style-type: none"> <li>• Included Processor Entities to Purpose:                   <ul style="list-style-type: none"> <li>◦ RGA INTERNATIONAL REINSURANCE COMPANY DESIGNATED ACTIVITY COMPANY for the purpose of Regulatory Compliance under RGA Entity of OMNILIFE INSURANCE COMPANY LIMITED</li> <li>◦ RGA International Corporation [Canada] for the purpose of Claims Handling. Under RGA Entity of OMNILIFE INSURANCE COMPANY LIMITED</li> <li>◦ RGA ENTERPRISE SERVICES COMPANY for the purpose of Valuation of Lifetime Mortgages under RGA Entity of OMNILIFE INSURANCE COMPANY LIMITED</li> </ul> </li> <li>• Added Data Subject Category for RGA UK Limited Services entity purpose of Audit.</li> </ul> </li> </ul> |