



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 [Canada]	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 [Canada]	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 [United States]	Processor	Policyholders / Insured Parties (ceding companies), Workforce Members (includes contractors, consultants & ex-employees)	Policy Details, Employment Information, Personal Characteristics, Name and Initials	
		RGA International Corporation [Canada]	Processor			
RGA UK Services Limited	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 UK Services Limited	Underwriting of Insurance Policies	RGA International [EU Branches]	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 [United States]	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 [United States]	Controller (Non-traditional business) & Processor			
RGA UK Services Limited	Assess Risk of Lifetime Mortgage Portfolio	RGA International Corporation [Canada]	Processor	Consumers (non-policy holders), Borrowers (lenders)	Personal Directory Information, Personal Characteristics, Policy Details, Name and Initials, Financial Account Information	-
		RGA Enterprise Services Company [United States]	Processor			
RGA UK Services Limited	Marketing	RGA International [EU & Singapore Branches]	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 [Canada]	Controller			
		RGA Reinsurance Company (all branches)	Controller			
		RGA Partnerships LLC [United States]	Controller			
		RGA Enterprise Services [United States]	Controller			
RGA UK Services Limited	Retrocession	RGA International Reinsurance Company DAC [Ireland]	Controller	Policyholders / Insured Parties (ceding companies)	Personal Characteristics, Name and Initials, Children Information, Personal Health Information, Policy Details	Health data
		RGA Reinsurance Company [United States]	Controller			
RGA UK Services Limited	Administration of Insurance Policies	RGA Life Reinsurance Company of Canada [Canada]	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 [Canada]	Processor			

		RGA Enterprise Services Company [United States]	Processor			
		RGA Americas Reinsurance Company, Ltd. [Bermuda]	Controller			
RGA UK Services Limited	Administration of Reinsurance Products	RGA International Reinsurance Company Designated Activity Company [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 [The Netherlands]	Controller			
		RGA Americas Reinsurance Company, Ltd. [Bermuda]	Controller			
		RGA Life Reinsurance Company of Canada [Canada]	Processor			
		RGA International Corporation [Canada]	Processor			
		RGA Enterprise Services Company [United States]	Processor			
RGA UK Services Limited	Adjudication of claims	RGA International Reinsurance Company dac Italian Branch [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 [Malaysia]				
		RGA Reinsurance Company Middle East Limited [United Arab Emirates]	Processor			
		RGA Americas Reinsurance Company, LTD., South Africa Branch [South Africa]	Processor			
		RGA Reinsurance Company Oficina de Representación en México [Mexico]	Processor			
RGA UK Services Limited	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 UK Services Limited	Pricing for Insurance Policies	RGA International Reinsurance Company DAC [Ireland]	Controller	Policyholders / Insured Parties (ceding companies), Beneficiaries	Personal Characteristics, Policy Details, Personal Directory Information, Employment Information	-
		RGA Internaional Reinsurance Company DAC, Singapore Branch [Singapore]	Controller			
		RGA International Corporation [Canada]	Controller			
		RGA Reinsurance Company [United States]	Controller			

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

		RGA Reinsurance Company of Australia Limited [Australia]	Controller	Job Applicants. Beneficiaries		
RGA International Reinsurance Company DAC, U.K. Branch Office	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, Children Information, Government-Issued Identification Number, Device Information	-
		RGA Enterprise Service Company [United States]	Controller			
RGA International Reinsurance Company DAC, U.K. Branch Office	Administration of Insurance Policies	RGA Enterprise Services Company [United States]	Processor	Policyholders / Insured Parties (ceding companies)	Policy Details, Personal Directory Information, Personal Characteristics, Employment Information, Name and initials, Employment Information, Personal Health Information, Children Information	Health Data
		RGA International Corporation [Canada]	Processor			
RGA International Reinsurance Company DAC, U.K. Branch Office	Underwriting of Insurance Policies	RGA International Reinsurance Company DAC [Ireland]	Controller	Policyholders / Insured Parties (ceding companies)	Personal Health Information, Personal Characteristics, Personal Directory Information, Financial-Related Information, Name and Initials, Government-Issued Identification Numbers	Health Data
		RGA Enterprise Services Company [United States]	Processor			

RGA International Reinsurance Company DAC, U.K. Branch Office	Marketing	RGA International [EU & Singapore Branches]	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 [Canada]	Controller			
		RGA Reinsurance Company (all branches)	Controller			
		RGA Partnerships LLC [United States]	Controller			
		RGA Enterprise Services [United States]	Controller			
RGA International Reinsurance Company DAC, U.K. Branch Office	Pricing for Insurance Policies	RGA International Corporation [Canada]	Controller	Policyholders / Insured Parties (ceding companies), Beneficiaries	Personal Characteristics, Policy Details, Employment Information, Personal Directory Information	-
		RGA International [EU & Singapore Branches]	Controller			
		RGA Americas Reinsurance Company [Bermuda]	Controller			
		RGA Reinsurance Company [United States]	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 INSURANCE COMPANY LIMITED	Claims Handling	RGA International Reinsurance Company DAC [Ireland]	Controller	Policyholders / Insured Parties (direct business), Beneficiaries	Personal Characteristics, Personal Health Information, Policy Details, Employment Information, Government-Issued Identification Numbers, Name and Initials, Personal Directory Information, Financial-Related Information, Other Sensitive Personal Information	Health Data
		RGA International Corporation [Canada]	Processor			
OMNILIFE INSURANCE COMPANY LIMITED	Administration of Insurance Policies	RGA International Reinsurance Company DAC [Ireland]	Controller	Policyholders / Insured Parties (direct business), Beneficiaries	Policy Details, Personal Health Information, Personal Characteristics, Employment Information, Policy Details, Name and initials, Government Issued Identification Numbers	Health Data
		RGA International Corporation [Canada]	Processor			
OMNILIFE INSURANCE COMPANY LIMITED	Valuation of Annuities	RGA International Corporation [Canada]	Processor	Policyholders / Insured Parties (direct business)	Personal Characteristics, Financial-Related Information, Name and Initials, Personal Directory Information, Policy Details	-
OMNILIFE INSURANCE COMPANY LIMITED	Valuation of Lifetime Mortgages	RGA International Corporation [Canada]	Processor	Policyholders / Insured Parties (ceding companies), Borrows (lenders)	Policy Details, Personal Characteristics, Name and Initials, Personal Directory Information, Segmentation Attributes	-
		RGA ENTERPRISE SERVICES COMPANY	Processor			
OMNILIFE INSURANCE COMPANY LIMITED	Reinsurance	RGA International Corporation [Canada]	Processor	Policyholders / Insured Parties (direct business)	Personal Characteristics, Name and Initials, Policy Details, Personal Health Information, Employment Information, Financial-Related Information, Personal Directory Information	-
		Tindall Associates, Inc. [United States]	Processor			
		RGA Americas Reinsurance Company,	Controller			

		Ltd. [Bermuda]				
OMNILIFE INSURANCE COMPANY LIMITED	Assess Risk of Lifetime Mortgage Portfolio	RGA International Corporation [Canada]	Processor	Borrows (lenders)	Policy Details, Segmentation Attributes, Personal Characteristics	-
		RGA Enterprise Services Company [United States]	Processor			
		RGA Investment Advisors LLC [United States]	Processor			
Hodge Life Assurance Company Limited	Regulatory Compliance	RGA Enterprise Services [United States]	Controller	Workforce Members (includes contractors, consultants & ex-employees)	Name and Initials, Employment Information, Education, Government- Issued Identification Number, Personal Characteristics, Education, Personal Directory Information,	Data Concerning Criminal Convictions or Offences, Biometric Data Used to Identify an Individual (e.g., fingerprints, DNA, 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: • Name change for RGAX LLC to RGA Partnerships LLC • Added, updated, and archived processing activities
Aug 2025	1.2	• Processing transfer entity to “RGA Americas Reinsurance Company, LTD., South Africa Branch” from “RGA Reinsurance Company of South Africa Limited [South Africa]” • Added Data Elements: ○ RGA UK Limited Services entity purpose of Valuation of Insurance Policies. ○ RGA UK Limited Services entity purpose of Retrocession. RGA International Reinsurance Company DAC, U.K. Branch Office entity purpose of Business Development • Included Processor Entities to Purpose: ○ RGA INTERNATIONAL REINSURANCE COMPANY DESIGNATED ACTIVITY COMPANY for the purpose of Regulatory Compliance under RGA Entity of OMNILIFE INSURANCE COMPANY LIMITED ○ RGA International Corporation [Canada] for the purpose of Claims Handling. Under RGA Entity of OMNILIFE INSURANCE COMPANY LIMITED ○ RGA ENTERPRISE SERVICES COMPANY for the purpose of Valuation of Lifetime Mortgages under RGA Entity of OMNILIFE INSURANCE COMPANY LIMITED • Added Data Subject Category for RGA UK Limited Services entity purpose of Audit.