



August 2025

BINDING CORPORATE RULES (UK):
APPENDIX 2
DATA SUBJECT RIGHTS PROCEDURE (UK) (PROCESSOR)

1 INTRODUCTION

- 1.1 RGA's "Binding Corporate Rules (UK): Controller Policy" and "Binding Corporate Rules (UK): Processor Policy" (together the "**Policies**" or, respectively, the "**Controller Policy**" and the "**Processor Policy**") safeguard Personal Information transferred between RGA's group members ("**Group Members**").
- 1.2 Data Subjects 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 (UK): Data Subject Rights Procedure (Processor) ("**Procedure**") describes how RGA will respond to any Requests received from Data Subjects 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 Data Subjects 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 a Data Subject 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 a Data Subject 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 a Data Subject 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 a Data Subject 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 a Data Subject 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 a Data Subject 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 a Data Subject 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 a Data Subject's Personal Information is primarily responsible for responding to a Request and for helping the Data Subject concerned to exercise his or her rights under Applicable Data Protection Laws.
- 3.2 As such, when a Data Subject contacts RGA to make any Request then where RGA Processes that Data Subject'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 Data Subject 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 a Data Subject, 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 to deal 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 the 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, or
- 4.2.3 where the Data Protection Team determines that RGA is a Processor of the Personal Information on behalf of a Controller that has ceased to exist, it will then determine whether the Request has been made validly under Applicable Data Protection Laws and whether confirmation of identity, or any further information, is required in order to fulfil the Request. RGA must then respond to the Request without undue delay and in any case no later than one month of receipt of that Request. That period may be extended by two further months where necessary, taking in account the complexity or number of Requests. RGA will inform the Data Subject who has made a Request of any extension within one month of receipt of the Request

5 REQUESTS FOR ACCESS TO PERSONAL INFORMATION

5.1 Overview

5.1.1 A Data Subject 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 recipient to whom the Personal Information have been or will be disclosed, in particular, recipients outside the UK;
- 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) the right to lodge a complaint with the Information Commissioner;

- g) where the Personal Information are not collected from the Data Subject making the Request, any available information as to their source;
- h) the existence of automated decision-making, including profiling; and
- i) where Personal Information is transferred from the UK to a country outside of the UK, the appropriate safeguards that the Controller has put in place relating to such transfers in accordance with Applicable Data Protection Laws.

5.1.2 A Data Subject 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 a Data Subject'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, or where the Controller has ceased to exist and RGA is responding to the Request directly, RGA will notify other Group Members, Third Party 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	Version	Change
Sep 2023	1.0	First (non-Draft) version
Sep 2024	1.1	No changes
August 2025	1.2	Change "Chief Security and Privacy Officer" to "Global Privacy Officer"?