



**August 2025**

BINDING CORPORATE RULES (UK):

APPENDIX 8

UPDATING PROCEDURE (UK) (PROCESSOR)

## **1 INTRODUCTION**

- 1.1 RGA's "Binding Corporate Rules (UK): Controller Policy" ("**Controller Policy**") and "Binding Corporate Rules (UK): Processor Policy" ("**Processor Policy**") (together the "**Policies**") safeguard Personal Information transferred between the RGA group members ("**Group Members**"). This Updating Procedure (UK) (Processor) sets out the way in which RGA will communicate changes to the Processor Policy to the Information Commissioner, individual data subjects, Controllers relying on the Policy and to Group Members.
- 1.2 Any reference to RGA in this procedure is to the Global Privacy Officer who will ensure that the commitments made by RGA in this Updating Procedure (UK) (Processor) are met.

## **2 MATERIAL CHANGES TO THE POLICIES**

- 2.1 RGA will communicate any material changes to the Policies (including any modification that would possibly affect the level of protection offered by the Binding Corporate Rules (UK) or significantly affect the Binding Corporate Rules (UK) including as a result of any change in Applicable Data Protection Laws without undue delay to all Group Members and to the Information Commissioner.
- 2.2 Where a change to the Processor Policy materially affects the conditions under which RGA Processes Personal Information on behalf of a Controller relying on the Policy 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.

## **3 ADMINISTRATIVE CHANGES TO THE POLICIES**

- 3.1 RGA will communicate changes to the Policies which:
- 3.1.1 are administrative in nature (including changes in the list of Group Members); or
  - 3.1.2 have occurred as a result of either a change of Applicable Data Protection Laws in the UK or due to any legislative, UK Court or Information Commissioner measure;
- to all Group Members on a regular basis and to the Information Commissioner at least once a year. RGA will also provide a brief explanation to the Information Commissioner of the reasons for any notified changes to the Policies.
- 3.2 In addition, RGA will make available changes to the Processor Policy which:
- 3.2.1 are administrative in nature (including changes in the list of Group Members); or
  - 3.2.2 have occurred as a result of a change of Applicable Data Protection Laws in the UK or due to any legislative, UK Court or Information Commissioner measure;
- to the Controller relying on the Policy on whose behalf RGA Processes Personal Information and the Data Subjects who benefit from the Policies via [www.rgare.com](http://www.rgare.com).

## **4 COMMUNICATING CHANGES TO THE POLICIES**

- 4.1 RGA will communicate all changes to the Policies, whether material or administrative in nature to the Information Commissioner, Group Members and Controllers relying on the Policy via a written notice (which may include e-mail) as soon as is reasonably practical.

- 4.2 RGA will maintain and update a list of Group Members bound by the Policies and of the Third Party Sub-Processors appointed by RGA to Process Personal Information on behalf of a Controller relying on this Policy. This information will be available on request from RGA.

## **5 LOGGING CHANGES TO THE POLICIES**

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.

## **6 NEW GROUP MEMBERS**

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

# CHANGE LOG

| Date     | Version | Change                                                                   |
|----------|---------|--------------------------------------------------------------------------|
| Sep 2023 | 1.0     | First (non-Draft) version                                                |
| Sep 2024 | 1.1     | No changes                                                               |
| Aug 2025 | 1.2     | Updated "Chief Security and Privacy Officer" to "Global Privacy Officer" |