May 2026

GLOBAL BINDING CORPORATE RULES (EU)

APPENDIX 3

PRIVACY COMPLIANCE STRUCTURE (PROCESSOR)

1. Introduction

1.1. Reinsurance Group of America Inc.'s ("**RGA**") compliance with global data protection laws and the "Binding Corporate Rules: Controller Policy" and "Binding Corporate Rules: Processor Policy" (together the "**Policies**" or, respectively, the "**Controller Policy**" and the "**Processor Policy**") is overseen and managed throughout all levels of the business by a global, multi-layered, cross-functional privacy compliance structure. Further information about RGA's Privacy Compliance Structure (Processor) is set out below and in the structure, chart provided at Figure 1.

2. Global Privacy Officer

2.1.1. RGA has appointed a Global Privacy Officer who provides oversight of, and has responsibility for, ensuring all RGA's legal entities remain in compliance with Applicable Data Protection Laws and the Policies. The Global Privacy Officer reports directly to the Data Privacy and Security Counsel, who reports to the Chief Compliance Officer who reports to the Chief Legal Officer. The Chief Legal Officer is accountable to RGA's Board of Directors on all material or strategic issues relating to RGA's compliance with Applicable Data Protection Laws and the Policies and is accountable to RGA's independent Audit Committee. The Global Privacy Officer leads, and is supported by, RGA's Global Data Privacy Team. The Global Privacy Officer fulfils the role and tasks of a Data Protection Officer (DPO) and liaises with RGA's additional DPOs (Section 3).

2.1.2. The Global Privacy Officer's key responsibilities include:

2.1.3. Ensuring that the Policies and other privacy related policies, objectives and standards are defined and communicated;

2.1.4. Providing clear and visible senior management support and resources for the Policies and for privacy objectives and initiatives in general;

2.1.5. Evaluating, approving and prioritizing remedial actions consistent with the requirements of the Policies, strategic plans, business objectives and regulatory requirements;

2.1.6. Periodically assessing privacy initiatives, accomplishments, and resources to ensure continued effectiveness and improvement;

2.1.7. Ensuring that RGA's business objectives align with the Policies and related privacy and information protection strategies, policies and practices;

2.1.8. Facilitating communications on the Policies and privacy topics with RGA's Board of Directors and independent Audit Committee; and

2.1.9. Dealing with any escalated privacy complaints in accordance with the Global Binding Corporate Rules: Complaint Handling Procedure (Controller or Processor, as applicable) (Appendix 6);

2.1.10. Reviewing and responding to Data Production Requests; and

2.1.11. Advising the Global Data Privacy Team on complex Data Subject Rights requests (i.e., complex access, objection to processing or restriction of processing requests) in accordance with the Binding Corporate Rules: Data Subject Rights Procedure (Controller or Processor, as applicable) (Appendix 2).

3. Data Protection Officers

3.1.1. RGA has also appointed a European Data Protection Officer (DPO) to further ensure compliance with Applicable Data Protection Laws and the Policies. The DPO retains a certain level of independence and serves in a consultative role both to the Global Privacy Officer and the group's EMEA based legal entities. The role reports both to the Managing Director and the Board of Directors of RGA International dac (based in Ireland). The role also has reporting lines to our other EMEA legal entities where Applicable Data Protection Laws require the legal entity to appoint a Data Protection Officer.

3.2. The DPO is involved in issues that relate to the protection of Personal Information. In particular, the tasks of the DPO are:

3.2.1. To inform and advise RGA and the Workforce Members who Process and/or handle Personal Information of their obligations under Applicable Data Protection Laws;

3.2.2. To monitor compliance with Applicable Data Protection Laws, and with the policies of RGA (including the Policies) that relate to the protection of Personal Information, including the assignment of responsibilities, awareness raising, and training of Workforce Members involved in Processing operations, and the related audits;

3.2.3. To provide advice, where requested, as regards data protection impact assessments and to monitor the performance of the data protection impact assessment process;

3.2.4. To cooperate with the Supervisory Authorities;

3.2.5. To be the point of contact for the Supervisory Authorities on issues relating to Processing, including in the context of a prior consultation, and to consult, where appropriate, with regard to any other matter; and the DPO shall, in the performance of his or her tasks, have due regard to the risks associated with Processing operations, taking into account the nature, scope, context, and purposes of Processing.

3.2.6. To respond to inquiries and compliance actions relating to the Policies from Data Subjects, Workforce Members, and BCR Members raised directly or through the DPO's dedicated e-mail address at dpo@rgare.com, available at www.rgare.com; and

3.2.7. To inform and advise the highest management.

3.2.8. In addition, the DPO can inform the highest management level if any questions or problems arise during the performance of their duties.

3.3. The DPO should not have any tasks that could result in conflict of interests. The DPO should not be in charge of carrying out data protection impact assessments, neither should they be in charge of carrying out the BCR-C audits if such situations can result in a conflict of interests. However, the DPO can play a very important and useful role in assisting the BCR members, and the advice of the DPO should be sought for such tasks.

4. Global Data Privacy Team

4.1.1. RGA's Global Data Privacy Team is comprised of RGA's VP, Data Privacy and Security Counsel, Global Privacy Officer, the Global Privacy Office (functionally situated in RGA's Law & Compliance organization) and a Regional Privacy Officer for APAC, responsible for data protection and privacy matters (functionally situated within RGA's Law & Compliance organization). Incorporating members from both compliance and legal teams ensures appropriate independence and oversight of duties relating to all aspects of RGA's data protection compliance. The Global Data Privacy Team is accountable for managing and implementing RGA's data privacy program internally (including the Policies), advising the organization on Applicable Data Protection Laws and privacy risks, providing recommendations and advice for complying with Applicable Data Protection Laws and for ensuring that effective data privacy controls are in place for any third party service provider RGA engages. In this way, the Global Data Privacy Team is actively engaged in addressing matters relating to RGA's privacy compliance on a routine, day-to-day basis. The responsibilities of the Global Data Privacy Team include:

4.1.2. Providing guidance about the collection and use of Personal Information subject to the Policies and to assess the Processing of Personal Information by RGA BCR Members for potential privacy-related risks;

4.1.3. Responding to inquiries and compliance actions relating to the Policies from Workforce Members, Customers, and other third parties raised directly with the Global Data Privacy Team or through its dedicated e-mail address at dataprotection@rgare.com;

4.1.4. Working closely with the Privacy Committee (defined at point 5 below) in sustaining compliance with the Policies and related policies and practices at a functional and local country level and in evaluating privacy risks involved in certain Processing activities providing guidance related to data protection and privacy and responding to questions and/or issues related to data protection and privacy;

4.1.5. Supporting regular audits of the Policies, coordinating responses to audit findings and supporting remediation of any issues raised by audit findings;

4.1.6. Responding to inquiries of the Supervisory Authorities where appropriate;

4.1.7. Monitoring changes to global privacy laws and ensuring that appropriate changes are made to the Policies and RGA's related policies and business practices;

4.1.8. Overseeing training for Workforce Members on the Policies and data protection legal requirements in accordance with the requirements of the Privacy Training Program (Controller or Processor, as applicable) (Appendix 4);

4.1.9. Promoting the Policies and privacy awareness across business units and functional areas through privacy communications and initiatives;

4.1.10. Evaluating privacy processes and procedures to ensure sustainability and effectiveness;

4.1.11. Periodic reporting on the status of the Policies to the Chief Compliance Officer and Board of Directors and / or Audit Committee, as appropriate;

4.1.12. Ensuring that the commitments made by RGA in relation to updating, and communicating updates to the Policies as set out in the Binding Corporate Rules: Updating Procedure (Controller or Processor, as applicable) (Appendix 8), are met; and

4.1.13. Overseeing compliance with the Data Subject Rights Procedure (Controller or Processor, as applicable) (Appendix 2) and the handling of requests made thereunder.

4.1.14. Dealing with any privacy complaints in accordance with the Binding Corporate Rules: Complaint Handling Procedure (Controller or Processor, as applicable) (Appendix 6).

4.1.15. In addition to its responsibilities as a member of the Global Data Privacy Team outlined above, RGA's Global Privacy Office also has a number of specific responsibilities in relation to the implementation and oversight of the Policies and privacy matters more generally, including:

4.1.16. Monitoring attendance of privacy training courses as set out in the Privacy Training Program (Controller or Processor, as applicable) (Appendix 4);

4.1.17. Performing audits and/or overseeing independent audits of compliance with the Policies as set out in the Audit Protocol (Appendix 5) and will ensure that such audits address all aspects of the Policies; and

4.1.18. Ensuring that any issues or instances of non-compliance with the Policies are brought to the attention of RGA's Global Data Privacy Team and the Global Privacy Officer and that any corrective actions are determined and implemented within a reasonable time.

5. Privacy Committee

5.1.1. RGA's Privacy Committee is comprised of functional leads or key representatives from the main functional areas within RGA, such as Compliance, Legal, Information Technology, Information Security and Human Resources. The key responsibilities of Members of the Privacy Committee include:

5.1.2. Promoting the Policies at all levels in their functional areas;

5.1.3. Assisting the Global Data Privacy Team with the day-to-day implementation and enforcement of RGA's privacy policies (including the Policies) within their respective areas of responsibility;

5.1.4. Escalating questions and compliance issues or communicating any actual or potential violation relating to the Policies to the Global Data Privacy Team; and

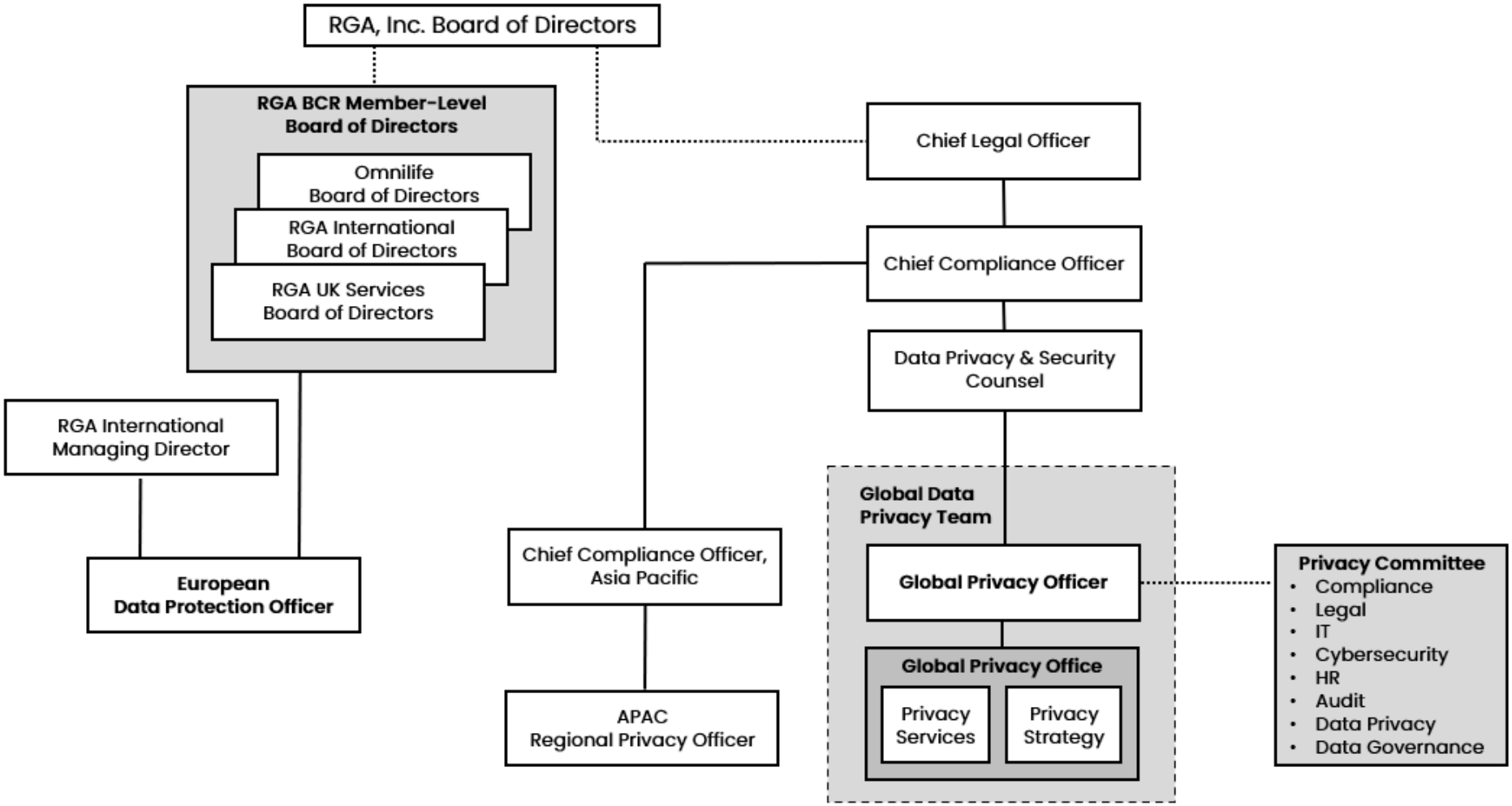
5.1.5. Through its liaison with the Global Data Privacy Team, the Privacy Committee serves as a channel through which the Global Data Privacy Team can communicate data privacy compliance actions to all key functional areas of the business.

5.2. The Privacy Committee will meet on a formal and regular basis, at a minimum frequency of every six months, to ensure a coordinated approach to data protection compliance across all functions.

6. RGA Workforce Members

6.1.1. All RGA Workforce Members are responsible for supporting the functional Privacy Committee members on a day-to-day basis and adhering to RGA's privacy policies. In addition, RGA Workforce Members are responsible for escalating and communicating any potential violation of the privacy policies to the appropriate Privacy Committee Member or, if they prefer, the RGA Global Data Privacy Team. On receipt of a notification of a potential violation of the privacy policy the issue will be investigated to determine if an actual violation occurred. Results of such investigations will be documented.

Figure 1: Overview of RGA's Data Protetion & Privacy Compliance Structure



Change Log

Date	Change
October 2021	Added 'EU' to distinguish from UK BCRs Updated structure diagram to reflect internal changes
May 2022	No updates – date refresh only
Oct 2024	Capitalized terms defined in Definitions section of BCR-C Policy Clarified responsibilities of Chief Privacy Officer, Data Protection Officer, and Data Protection Team. Updated "Group Member" to "BCR Member", "Data Protection Authority" to "Supervisory Authority" and "national" to "EEA"
May 2025	Updated Appendix and Figure 1 to reflect organizational changes Clarified titles/names of roles and their relationships to each other Updated "Chief Privacy Officer" to "Global Privacy Officer" Updated "Data Protection Team" to "Global Data Privacy Team" In Section 2, added reference to Chief Compliance Officer In Section 3, added reporting structure details In Section 4, added Appendix numbers for ease of reference
May 2026	In Section 2, updated to reflect changes in reporting organzation In Section 4, updated to reflect changes in reporting organization Updated Appendix Figure 1 to reflect changes in reporting organization