May 2026

GLOBAL BINDING CORPORATE RULES (EU)

APPENDIX 4

PRIVACY TRAINING PROGRAM (PROCESSOR)

1. Introduction

1.1.1. The “Binding Corporate Rules: Controller Policy” and “Binding Corporate Rules: Processor Policy” (together the “**Policies**” or, respectively, the "**Controller Policy**" and the "**Processor Policy**") provide a framework for the transfer of Personal Information between Reinsurance Group of America Inc. ("**RGA**") BCR members ("BCR **Members**"). The purpose of the Privacy Training Program (Processor) document is to provide a summary as to how RGA trains its Workforce Members on the requirements of the Processor Policy

1.2. RGA trains its Workforce Members whose roles will bring them into contact with Personal Information, on the basic principles of data protection, confidentiality and information security awareness. It also provides specific training on particular legal obligations, such as the Health Insurance Portability and Accountability Act of 1996 ('HIPAA') in the US, and requirements and best practices, such as those specified by the International Organization for Standards (ISO) 27001 and on the General Data Protection Regulation (GDPR).

1.3. Workforce Members who have permanent or regular access to Personal Information and are involved in the Processing of Personal Information or in the development of tools to Process Personal Information receive additional, tailored training on the Policies and specific data protection issues relevant to their role. This training is further described below and is repeated on a periodic basis.

2. Responsibility for the Privacy Training Program

2.1. RGA's Data Protection Team has overall responsibility for privacy training at RGA, with input from colleagues in other functional areas including Information Security, HR and other departments, as appropriate. They will review the training curriculum from time to time to ensure it addresses all relevant aspects of the Policies and that it is appropriate for individuals who have permanent or regular access to Personal Information, who are involved in the Processing of Personal Information or in the development of tools to Process Personal Information.

2.2. RGA's senior management supports the attendance of the privacy training courses and is responsible for ensuring that individuals within RGA are given appropriate time to attend and participate in such courses. Course attendance is monitored via regular audits of the training process. These audits are performed by RGA's Compliance team and/or independent third party auditors.

2.3. In the event these audits reveal persistent non-attendance, such findings will escalate to the Global Privacy Officer for further action. Such action may include escalation of non-attendance to the appropriate management authority within RGA who will be responsible and held accountable for ensuring that the individual(s) concerned attend and actively participates in such training.

3. About the training courses

3.1. RGA has developed mandatory electronic training courses, supplemented by additional training for Workforce Members, which could be face to face, on teleconference or video conferencing. The courses are designed to be both informative and user-friendly, generating interest in the topics covered. Workforce Members must correctly answer a series of multiple-choice questions on the electronic training courses for the course to be deemed complete.

3.2. All Workforce Members will be required to complete the training:

3.2.1. as part of their induction program;

3.2.2. as part of a regular refresher training at least once every two years (the timing of which is determined by RGA's Data Protection Team); and

3.2.3. when necessary based on changes in the law or to address any compliance issues arising from time to time.

3.3. Certain Workforce Members will receive specialist training, including those who are involved in particular Processing activities such as those who work in HR Business Development, Operations, Claims, Underwriting, Pricing, GFS and RGAx, or whose business activities include Processing Sensitive Personal Information. Specialist training is delivered in the form of additional modules to the basic training package, which will be tailored depending on the course participants.

4. Training on the Policies

4.1. RGA's training on the Policies will cover the following main areas:

4.1.1. Background and rationale:

a) What is data protection law?

b) How data protection law will affect RGA internationally.

c) The scope of the Policies.

d) Terminology and concepts.

4.1.2. The Policies:

a) An explanation of the Policies.

b) Practical examples.

c) The rights that the Policies give to individuals.

d) The privacy implications arising from Processing Personal Information for clients.

4.1.3. Where relevant to a Workforce Member's role, training will cover the following procedures under the Policies:

a) Data Subject Rights Procedure (Controller or Processor, as applicable).

b) Updating Procedure (Controller or Processor, as applicable).

c) Cooperation Procedure (Controller or Processor, as applicable).

d) Complaint Handling Procedure (Controller or Processor, as applicable).

e) Non-compliance to BCR Procedure (Rules 18, 19, and 20)

5. Further information

Any queries about training under the Policies should be addressed to RGA's Data Protection Team at privacy@rgare.com.

Change Log

Date	Change
October 2021	Added 'EU' to distinguish from UK BCRs
May 2022	No updates – date refresh only
Oct 2024	Noted role-specific training regarding "Non-compliance to BCR" Updated "Group Member" to "BCR Member"
May 2025	Updated 'Chief Privacy Officer' to 'Global Privacy Officer'
May 2026	No updates – date refresh only