

Personal Information Protection Policy (Privacy Policy)

RGA Reinsurance Company Japan Branch

Akasaka 9-7-1, Midtown Tower 41F, Minato-ku, Tokyo, Japan

Co-CEO of Japan Branch Yasuhisa Watanabe

Co-CEO of Japan Branch Andrew Graham Bishop

As the Personal Information Handling Business Operator, RGA Reinsurance Company Japan Branch (“the Company”) strongly recognizes the importance of the protection of personal information. The Company shall comply with Act on the Protection of Personal Information (“APPI”) and other applicable laws and regulations, and secure appropriate personal information handling without damaging customer trust.

1. Purpose of Personal Information Use

The Company through reinsurance transaction receives personal information from other life insurers for the purposes listed below to the extent necessary to conduct our business.

- Discussion, negotiation and conclusion of Reinsurance Treaties (including retrocession)
- Underwriting, maintaining and managing the reinsured policies
- Payment of reinsurance money (death benefit, medical benefit etc.)
- Other business conduct and operation incidental or relating to reinsurance business

2. Types of Personal Information to Receive

The company receives the necessary information, such as names, date of birth, gender, address, phone number, insurance policy data, or other information required for executing the business mentioned in Section 1 of this policy.

3. Sensitive Information

The Company shall not handle information concerning health and medical, etc. (“Sensitive Information”) unless the purpose is in compliance with Article 53-10 of Ordinance for Insurance Business Law and Article 5 of the FSA personal information guideline.

4. Personal Information Provision to Third Party

The Company shall not provide any personal information to a third party except when;

- The Company has prior consent of the principal.

- The Company outsources part of its operation to a third party vendor for the purposes set forth in Section 1 of this policy by entering into a contract that has non-disclosure clause and compliance clause with APPI .
- It is required by laws and regulations, etc.
- There is a need to protect a human life, body or fortune, and when it is difficult to obtain a principal's consent
- There is a special need to enhance public hygiene or promote fostering healthy children, and when it is difficult to obtain a principal's consent
- There is a need to cooperate in regard to a central government organization or a local government, or a person entrusted by them performing affairs prescribed by laws and regulations, and when there is a possibility that obtaining a principal's consent would interfere with the performance of the said affairs

5. Personal Information Provision to Third Party in foreign countries

The Company provides customer information to third parties in foreign countries (*) after confirming that such third parties have a system which provides equivalent privacy protections as are stipulated under APPI and other applicable laws and regulations. In this regard, pursuant to Article 28, Paragraph 3 of the Act and Article 18 of the Enforcement Regulations, the following information will be provided upon request by Customer:

- 1) Method of establishing the system prescribed in Article 28, Paragraph 1 of the Act by such third party
- 2) Outline of Equivalent Measures Implemented by the Third Party
- 3) Frequency and method of confirmation in accordance with Article 18, Paragraph 1, Item 1
- 4) The name of the country
- 5) Existence or nonexistence of a system in the foreign country that may affect the implementation of equivalent measures by the third party and an outline thereof
- 6) Whether or not there is any hindrance to the implementation of the corresponding measures by the third party and an outline thereof
- 7) Outline of measures taken by the personal information handling business operator in accordance with the provisions of Article 18, Paragraph 1, Item 2 with regard to the problems set forth in the preceding item

6. Joint Use of Personal Information by RGA Group Companies

The Company may use personal information jointly with RGA Group entities for the purposes listed below to the extent necessary to conduct our business, in order to make a concerted efforts to provide comprehensive services in reinsurance business in an efficient manner. The contents of joint use are as follows.

(1) Data items for joint use

Such as names, date of birth, gender, address, phone number, insurance policy data, or other information required for executing the business mentioned in Section 1 of this policy.

(2) Extent of users

Entities listed in “SUBSIDIARIES OF REINSURANCE GROUP OF AMERICA, INCORPORATED” attached to the Form 10-K of Reinsurance Group of America, Incorporated

(3) Purposes

The following operations jointly conducted by RGA group entities stated in (2) above
Operations specified in the Section 1 of this policy

(4) Responsible party to personal information management

RGA Reinsurance Company Japan Branch
Akasaka 9-7-1, Midtown Tower 41F, Minato-ku, Tokyo, Japan
Co-CEO of Japan Branch Yasuhisa Watanabe
Co-CEO of Japan Branch Andrew Graham Bishop

Please refer to RGA Group Privacy Policy by visiting <https://www.rgare.com/privacy-policy>.

7. Personal Information Security Measures

The Company sets out rules on personal information protection and takes measures in accordance with such rules to prevent leakage and loss of or damage to personal data. The Company conducts personal information protection training to its employees and commit itself to continuous effort for improvement.

Specifically, we have taken the following safety management measures.

(Formulation of Privacy Policy)

In order to ensure the proper handling of personal data, the Company has established this Personal Information Protection Policy, a basic policy that stipulates the name of the business operator, compliance with relevant laws and guidelines, matters related to safety management measures, contact points for handling inquiries and complaints, etc.

(Development of Discipline Pertaining to the Handling of Personal Data)

At each stage of acquisition / input, use / processing, storage, transfer / transmission, deletion / disposal, we have established rules for the handling of personal data, including handling methods, responsible personnel and their duties.

(Organizational Safety Management Measures)

In addition to appointing a person responsible for handling personal data, the Company clarifies who handles personal data and the scope of personal data handled by such employees. Also the Company has established a system for reporting to responsible personnel when they are aware of any fact or sign of violation of laws and handling regulations. The Company also conducts regular self-inspections of the handling status of personal data.

(Human Safety Management Measures)

Employees are given regular training regarding the handling of personal data, and the confidentiality of personal data is stated in the rules of employment.

(Physical Safety Management Measures)

We take measures to prevent the theft or loss of equipment, electronic media, and documents that handle personal data. We also take measures to ensure that personal data is not easily revealed when the equipment, electronic media, and other items are carried around, including when moving within the office.

(Technical Safety Management Measures)

Access control is implemented to limit the scope of personnel in charge and personal information databases handled, and a mechanism has been introduced to protect information systems that handle personal data from unauthorized access from outside or unauthorized software.

(Understanding of External Environment)

We are implementing safety management measures based on an understanding of systems related to the protection of personal information in the following countries where personal data is processed.

Australia, Barbados, British Bermuda, Brazil, Canada, United Arab Emirates (DIFC), France, Germany, Hong Kong, India, Ireland, Italy, Malaysia, Mexico, New Zealand, Poland, Singapore, Spain, Switzerland, South Korea, South Africa, Taiwan, Netherlands, United Kingdom, United States of America (e.g. Missouri)

8. Retained Personal Data

The Company retains Personal Data as follows.

- (1) Name, Address and CEO of the said Personal Information Handling Business Operator
RGA Reinsurance Company Japan Branch
Akasaka 9-7-1, Midtown Tower 41F, Minato-ku, Tokyo, Japan
Co-CEO of Japan Branch Yasuhisa Watanabe
Co-CEO of Japan Branch Andrew Graham Bishop
- (2) Purpose of use for all retained personal data
Purpose of use specified in Section 1 of this policy
- (3) Data items of retained personal data
Such as names, date of birth, gender, address, insurance policy data, or other information required for executing the business specified in Section 1 of this policy.

9. Notice of Purpose of Utilization, Disclosure, Correction, Addition, Deletion, Suspension of Use, Suspension of third party provision, Disclosure of third party provision records for Retained Personal Data

The Company shall respond any principal's request to such insurer on notifying purpose of use or disclosure of retained personal data complying with the laws and regulations when the requester shall be identified as the principal. The Company shall convey to a ceding insurer the information of any principal's request to such insurer on notifying correction, addition, deletion, suspension of its use, suspension of third party provision and disclosure of third party provision records.

Please contact RGA Contact in Section 11 with the evidence for personal identification by post regarding above requests.

We ask for your understanding that the requester should bear the costs for sending documents.

10. Handling of Anonymously Processed Information

The Company will not produce Anonymously Processed Information. When the Company provides Anonymously Processed Information to a third party, the Company shall publicly announce the items of information concerning individuals included in the Anonymously Processed Information to be provided and the method of provision, and clearly indicate to the third party that the information to be provided is Anonymously Processed Information.

With respect to Anonymously Processed Information held by the Company, the Company will provide such information to third parties on an ongoing basis after clearly indicating that such

information is Anonymously Processed Information.

(1) Items of information concerning individuals included in the Anonymously Processed Information

(i) Age (month of birth)

(ii) Gender

(iii) Social insurance eligibility information (individual/family classification, date of eligibility acquisition/loss, etc.)

(iv) Details of the medical fee statement (name of the injury or disease, date of admission and discharge (hospital visit), date of medical treatment, etc.)

(v) Health checkup item data (numerical values, etc.)

(vi) Date of health checkup, data on health guidance items (numerical values, etc.)

(vii) Lifelog information (number of steps, etc.)

(2) Method of provision

(i) E-mail

(ii) File sharing service

(iii) Share Folder of RGA group companies

(iv) Physical delivery of external storage medium

11. Contacts

Please do not hesitate to contact any of the contacts below should you have any questions, consultations, opinions or complaints regarding the personal information handling.

<RGA Contact>

RGA Reinsurance Company Japan Branch

Compliance and Legal

41F, Midtown Tower, 9-7-1Akasaka, Minato-ku, Tokyo, 107-6241

Tel☐ 03-3479-7191(Main)

From☐ 9:00 to 17:00☐ except for Sat, Sun & holidays)

<Authorized Personal Information Protection Organization>

The Company is a member of Foreign Non-Life Insurance Association of Japan which is one of the Authorized Personal Information Protection Organization,

Foreign Non-Life Insurance Association of Japan (FNLIA)

HP: <http://www.fnlia.gr.jp/>

< Designated Dispute Resolution Organization>

The Company has the contract with General Association Insurance Ombudsman which is one of the Designated Dispute Resolution Organization.

General Association Insurance Ombudsman

HP: <http://www.hoken-ombs.or.jp/>

TEL: 03-5425-7963

From □ 9:00 to 17:00 □ except for 12:00 to 13:00 and Sat, Sun & December 29th to January 4th)

(*) "Foreign country" refers to a country or region outside Japan, and excludes foreign countries that have systems for the protection of personal information that are considered to be at the same level as Japan in terms of protecting the rights and interests of individuals as defined by the rules of the Personal Information Protection Commission.

(February 14th 2023)