

Feb 2023



BINDING CORPORATE RULES (EU):

APPENDIX 8

UPDATING PROCEDURE (CONTROLLER)

1 INTRODUCTION

- 1.1 Reinsurance Group of America Inc.'s ("**RGA**") "Binding Corporate Rules: Controller Policy" ("**Controller Policy**") and "Binding Corporate Rules: Processor Policy" ("**Processor Policy**") (together the "**Policies**") safeguard Personal Information transferred between the RGA group members ("**Group Members**"). This Updating Procedure (Controller) sets out the way in which RGA will communicate changes to the Controller Policy to the European data protection authorities, individual data subjects, Controllers and to the Group Members.
- 1.2 Any reference to RGA in this procedure is to the Chief Privacy Officer who will ensure that the commitments made by RGA in this Updating Procedure (Controller) 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 or significantly affect the Binding Corporate Rules, including as a result of any change in Applicable Data Protection Laws) without undue delay to the competent Data Protection Authority and to any other relevant European data protection authorities.

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 any European country or due to any legislative, court or supervisory authority measure;to the competent Data Protection Authority and to any other relevant European data protection authorities at least once a year. RGA will also provide a brief explanation to the competent Data Protection Authority and to any other relevant data protection authorities of the reasons for any notified changes to the Policies.

4 COMMUNICATING CHANGES TO THE POLICIES

- 4.1 RGA will communicate all changes to the Policies, whether material or administrative in nature:
 - 4.1.1 to the Group Members bound by the Policies via written notice (which may include e-mail); and
 - 4.1.2 systematically to Controllers and the individuals who benefit from the Policies via www.rgare.com.
- 4.2 RGA will maintain and update a list of Group Members bound by the Policies. 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	Change
October 2021	Added 'EU' to distinguish from UK BCRs
May 2022	Minor typos
Feb 2023	No updates – date refresh only