

**EU Binding Corporate Rules
RGA Controller Policy (Summary Statement)**

Effective November 2024

PART I - INTRODUCTION

The RGA group companies are committed to the protection of the personal information we collect, store,

purposes unless such further processing is consistent with the applicable data protection law of the country in which the personal information was collected.

Rule 4 Data minimisation and accuracy:

- a) RGA will keep personal information accurate and up to date.
- b) RGA will only process personal information that is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.

Rule 5 Limited retention of personal information:

- a) RGA will only keep personal information for as long as is necessary for the purposes for which it is collected and further processed.

Rule 6 Security and confidentiality:

- a) RGA will implement appropriate technical and organizational measures to ensure a level of security around personal information that is appropriate to the risk for the rights and freedoms of the individuals.
- b) RGA will ensure that providers of services to RGA also adopt appropriate and equivalent security measures.
- c) RGA will comply with data security breach notification requirements under applicable data protection laws.

Rule 7 Honouring data privacy rights:

- a) RGA will adhere to the Data Subject Rights Procedure (Controller) and will respond

Part II Section C (Third Party Beneficiary Rights):

In such cases, the individual's rights are as follows:

- *Complaints*: Individuals may submit complaints to any EEA Entity in accordance with the Complaint Handling Procedure (Controller) (Appendix 6) and may also lodge a complaint with an EEA supervisory authority in the jurisdiction of their habitual residence, place of work, or place of the alleged infringement;
- *Proceedings*: Individuals have the right to an effective judicial remedy if their rights under the Controller Policy have been infringed as a result of the processing of their personal information in non-compliance with the Controller Policy. Individuals may bring proceedings against RGA International Reinsurance Company dac (Ireland) to enforce compliance with the Controller Policy, whether in relation to non-compliance by an EEA Entity or Non-EEA Entity, before the competent courts of the EEA Member State (either the jurisdiction where the controller or processor is established or where the individual has his/her habitual residence);
- *Compensation*: Individuals who have suffered material or non-material damage as a result of

reflect those changes and we will inform you of such changes by updating the effective date at the top of this BCR Summary Statement.