



## 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

- 2.2.8. Reviewing and responding to Data Production Requests; and
- 2.2.9. Advising the Data Protection 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. In addition to the Chief Privacy Officer

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. Data Protection Team

4.1. RGA's Data Protection Team is comprised of RGA's Chief Privacy Officer, the Global Data Protection Office (functionally situated in RGA's Global Risk and Compliance organization) and RGA's Data Protection and Privacy Counsel (functionally situated within RGA's Global Legal Services organization). Incorporating members from both RGA's Risk and Compliance and Legal Services organizations, the Data Protection Team is responsible for the development, implementation, and maintenance of RGA's data protection program, including the RGA's Data Protection Policy and the RGA's Data Protection Procedures. The Data Protection Team also provides guidance and support to RGA's employees and contractors on data protection matters.

- 4.1.4. Supporting regular audits of the Policies, coordinating responses to audit findings and supporting remediation of any issues raised by audit findings;
- 4.1.5. Responding to inquiries of the Supervisory Authorities where appropriate;
- 4.1.6.



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



