



## **1 INTRODUCTION**

- 1.1 RGA's "Binding Corporate Rules (UK): Controller Policy" and "Binding Corporate Rules (UK): Processor Policy" (together the "**Policies**" or, respectively, the "**Controller Policy**" and the "**Processor Policy**") safeguard Personal Information transferred between RGA's group members ("**Group Members**").
- 1.2 Data Subjects whose Personal Information are processed by RGA under the Policies have certain data protection rights, which they may exercise by making a request to the Controller of their information (a "**Request**").
- 1.3 This Binding Corporate Rules (UK): Data Subject Rights Procedure (Controller) ("**Procedure**") describes how RGA will respond to any Requests it receives from Data Subjects whose Personal Information are Processed and transferred under the Controller Policy.

## **2 DATA SUBJECTS' DATA PROTECTION RIGHTS**

- 2.1 RGA must assist Data Subjects

#### **4 INITIAL ASSESSMENT OF A REQUEST**

- 4.1 Upon receiving any Request from a Data Subject, RGA will ensure all such Requests are immediately routed to the Data Protection Team at [dsr@rgare.com](mailto:dsr@rgare.com). The Data Protection Team (consisting of the regional compliance functions) will document the date on which such Request was received together with any other information that may assist the Data Protection Team to deal with the Request.
- 4.2 The Data Protection Team



### 6.3 Response to an Access Request

- 6.3.1 The Data Protection Team will conduct a search of all relevant and in-scope electronic and paper filing systems.
- 6.3.2 The Data Protection Team may refer any complex cases to RGA's Chief Security and Privacy Officer for advice, particularly where the Request includes information relating to third parties or where the release of Personal Information may cause harm to the Data Subject or prejudice commercial confidentiality or legal proceedings.
- 6.3.3 The information requested will be collated by the Data Protection Team into a readily understandable format (internal codes or identification numbers used at RGA that correspond to Personal Information shall be translated before being disclosed). The Data Protection Team will prepare a covering letter, which shall include all information required to be provided in response to an Access Request.
- 6.3.4 Where the provision of the information in permanent form is not possible or would involve disproportionate effort, there is no obligation to provide a permanent copy of the information. The other information referred to in section 6.1.1 above must still be provided. In such circumstances, the Data Subject may be offered the opportunity to have access to the information by inspection or to receive the information in another form, such as any commonly used electronic form.
- 6.3.5 RGA may charge a reasonable fee based on administrative costs of providing further copies of the data.

## 7 **REQUESTS FOR ERASURE OR RECTIFICATION OF PERSONAL INFORMATION, OR RESTRICTION OR CESSATION OF PROCESSING OF PERSONAL INFORMATION, OR DATA PORTABILITY**

- 7.1 If RGA receives a Request to correct, update, transmit (data portability) or erase Personal Information, or to restrict or cease Processing of a Data Subject's Personal Information where RGA is the Controller for that Personal Information, such Request must be passed to the Data Protection Team at [dsr@rgare.com](mailto:dsr@rgare.com) immediately to make an initial assessment in accordance with section 4 above.
- 7.2 If a Request is received advising of a change in a Data Subject's Personal Information where RGA is the Controller for that Personal Information, such information must be rectified, updated, or erased accordingly.
- 7.3 When RGA rectifies or erases Personal Information, in its capacity as Controller, RGA will notify other Group Members, Third Party Processors, or other recipients to whom the Personal Information has been disclosed accordingly so that they can also update their records, unless this proves impossible or involves disproportionate effort. When acting as Controller, RGA shall inform the data subject about those recipients if he or she requests it.
- 7.4 If a Request is made to RGA as a Controller to cease Processing that Data Subject's Personal Information (where RGA has a legitimate interest to Process such Personal Information) because the rights and freedoms of the Data Subject are prejudiced by virtue of such Processing by RGA, the matter will be referred to RGA's Chief Security and Privacy Officer to assess in accordance with Applicable Data Protection Laws. Where RGA can demonstrate compelling legitimate grounds for the Processing, which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of a legal claim, the Request will not be regarded as valid.

## 7.5 If a Request is made to RGA as a Controller to restrict Processing of

# CHANGE LOG

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