

Oct 2024

GLOBAL BINDING CORPORATE RULES (EU)

APPENDIX 6

COMPLAINT HANDLING PROCEDURE (CONTROLLER)



1. Introduction

- 1.1. Reinsurance Group of America Inc.'s ("**RGA**") "Binding Corporate Rules: Controller Policy" and "Binding Corporate Rules: Processor Policy" (together the "**Policies**" or, respectively, the "**Controller Policy**" and the "**Processor Policy**") safeguard Personal Information transferred between the RGA BCR members ("**BCR Members**"). In order to effect individuals' third party beneficiary rights under the Binding Corporate Rules, RGA maintains a Complaint Handling Process for individuals to directly contact RGA regarding its compliance with the Policies. The purpose of this Complaint Handling Procedure (Controller) is to describe the practical steps individuals whose Personal Information is Processed by RGA under the Controller Policy may take to submit complaints and how such complaints are dealt with by RGA.
- 1.2. This procedure will be made available to individuals whose Personal Information is Processed by RGA under the Controller Policy.

2. How individuals can bring complaints

- 2.1 Individuals may bring complaints in writing by contacting RGA's Chief Privacy Officer at privacy@rgare.com, or by contacting any of the RGA EEA BCR Entities listed in Appendix 1.

3. Complaints where RGA is a Controller

Who handles complaints?

- 3.1. RGA's Data Protection Team will handle all complaints arising under the Controller Policy. RGA's Chief Privacy Officer will liaise with colleagues from relevant business and support units as appropriate to address the issues raised in the complaint.
- 3.2. RGA's Data Protection Team will acknowledge receipt of a complaint to the individual concerned within 5 working days by sending a Complaint Receipt and Acknowledgment response email to the complainant individual. Thereafter, RGA will investigate the merits of the complaint, the underlying facts and circumstances surrounding the issues raised and will provide a substantive response within one month of the receipt of the complaint. The substantive response to the complainant individual will include an indication of whether the complaint is rejected or whether the complaint is considered justified.

- 3.3. If, due to the complexity of the complaint or number of requests, a substantive response cannot be provided within this period, RGA's Data Protection Team will advise the complainant accordingly and provide a reasonable estimate (not exceeding a maximum of two further months) for the timescale within which a response will be provided. Every effort will be made to provide a substantive response to the individual without unreasonable delay and RGA shall at all times consider the interests of the individual.
- 3.4. If RGA considers the complaint as justified, the Chief Privacy Officer shall work with the complainant to reach a satisfactory conclusion.
- 3.5. If RGA rejects the complaint, the substantive response shall include:
- 3.5.1. the reason(s) why RGA disagrees with the complaint, and
 - 3.5.2. clear notification regarding the complainant's right to dispute the finding with RGA and/or a Supervisory Authority (see Sections 3.6, 3.7, and 4).

What happens if a complainant disputes a finding?

- 3.6. If the complainant disputes the response from RGA's Data Protection Team or any aspect of a finding and notifies RGA's Data Protection Team, the matter will be referred to RGA's Chief Privacy Officer. The Chief Privacy Officer will review the case and advise the complainant of his/her decision either to accept the original finding or to substitute a new finding. The Chief Privacy Officer will respond to the complainant within one month of the receipt of the complaint. As part of the review, the Chief Privacy Officer may arrange to meet the parties to the complaint in an attempt to resolve it. If, due to the complexity of the complaint, a substantive response cannot be given within this period, the Chief Privacy Officer will advise the complainant accordingly and provide a reasonable estimate for the timescale within which a response will be provided which will not exceed three months from the date the complaint was referred.
- 3.7. If the complainant persists in disputing the substantive response and/or resolution proposed by the Chief Privacy Officer, the Chief Privacy Officer will arrange for any necessary steps to be taken as a consequence, including involvement of the European Data Protection Officer.

4. Right to complain to an EEA Supervisory Authority and/or to lodge a claim with a court of competent jurisdiction

- 4.1. Regardless of whether or not they have first complained directly to RGA, individuals have the right at all times to complain to a Competent Supervisory Authority and/or to lodge a claim with a court of competent jurisdiction in accordance with Applicable Data Protection Laws.
- 4.2. Individuals may lodge a complaint with the Supervisory Authority of the individual's habitual residence, the Data Subject's place of work or the place of the alleged infringement.
- 4.3. In the event that the matter relates to Personal Information which was collected and / or used by a BCR Member in the EEA, but then transferred to a BCR Member outside the EEA and an individual wants to make a claim against RGA, the claim may be made against the BCR Member in the EEA responsible for Processing and exporting of the Personal Information. The claim can also be made to the courts of the Member State where the individual has his or her habitual residence.

Change Log

Date	Change
October 2021	Added 'EU' to distinguish from UK BCRs
May 2022	No update – date refresh only
Feb 2023	No update – date refresh only
Oct 2024	Capitalized terms defined in Definitions section of BCR-C Policy Updated terms “European” to “EEA”, “Group Member” to “BCR Member”, and “Data Protection Authority” to “Supervisory Authority” Added details regarding how individuals can bring complaints Added details regarding how rejected complaints and those considered as justified are handled

