Oct 2024

GLOBAL BINDING CORPORATE RULES (EU)
APPENDIX 9
IN SCOPE DATA TRANSFERS (CONTROLLER)



In scope data transfers:

This table identifies the EEA sourced personal data that is transferred out of the EEA by the RGA entity acting as the Controller. It lists the categories of Data Subjects and the types of data transferred to non-EEA RGA entities and for what purpose.

Note: Some recipient RGA entities listed here may be established in jurisdictions currently deemed Adequate by the EU. Where this is the case then personal data will flow using 'Adequacy' as the transfer mechanism. (This list is a comprehensive list of transfers. All transfers are included here as EU Adequacy status *could* change for some entities in which case these Binding Corporate Rules will become the transfer mechanism).

From RGA (EEA) Entity	Purpose for BCR / After Transfer	To RGA (Non- EEA) Entity [Country]	RGA (Non- EEA) Entity acting as	Data Subject Categories	Data Elements - Personal Data	Data Elements - Special Category Personal Data
RGA International Reinsurance Company dac [Ireland,	Performance of Background Checks for Employment Purposes	RGA UK Services Limited [United Kingdom]	Processor	Workforce Members, Job Applicants	Education, Personal Characteristics, Financial- Related Information, Employment Information, Name and Initials,	Criminal Convictions
Italy Branches]	Purposes	RGA International Corporation [Canada]	Processor		Personal Directory Information, Government-Issued Identification Numbers	
RGA International Reinsurance Company dac [France	Performance of Background Checks for Employment Purposes	RGA UK Services Limited [United Kingdom]	Processor	Workforce Members, Job Applicants	Personal Characteristics, Personal Directory Information, Name and Initials	N/A
Branch]	Purposes	RGA International Corporation [Canada]	Processor			
RGA International Reinsurance Company dac [Spain Branch]	Performance of Background Checks for Employment Purposes	RGA UK Services Limited [United Kingdom]	Processor	Workforce Members, Job Applicants	Financial-Related Information, Name and Initials, Government- Issued Identification Numbers	N/A
RGA International Reinsurance Company Designated	International Seinsurance Lin Company Kir	RGA UK Services Limited [United Kingdom]	Processor	Workforce Members	Employment Information, Children Information, Personal Characteristics, Name and Initials, Personal Directory	Health Information
Activity Company [Ireland]		RGA International Corporation [Canada]	Processor		Information, Financial- Related Information, Government-Issued Identification Numbers	

From RGA (EEA) Entity	Purpose for BCR / After Transfer	To RGA (Non- EEA) Entity [Country]	RGA (Non- EEA) Entity acting as	Data Subject Categories	Data Elements - Personal Data	Data Elements - Special Category Personal Data
RGA International Reinsurance Company dac [Germany,	HR - Benefits	RGA UK Services Limited [United Kingdom]	Controller [Spain] and Processor	Workforce Members, Beneficiaries [Spain], Children	Education [Germany], Personal Characteristics, Government-Issued Identification Numbers, Employment Information, Name and Initials,	N/A
Italy, Netherlands, Poland, Spain Branches]		RGA International Corporation [Canada]	Processor		Personal Directory Information, Policy Details, Children Information [Italy, Spain], Financial-Related Information	
RGA International Reinsurance Company dac [EU Branches]	HR - Benefits	RGA Enterprise Services Company [United States]	Controller	Workforce Members	Employment Information, Name and Initials, Financial-Related Information, Personal Characteristics, Personal Directory Information, Government-Issued Identification Number	N/A
RGA International Reinsurance Company dac [France,	Claims REINSURANCE COMPANY [United States]	Controller	Policyholders	Policy Details, Personal Characteristics, Name and Initials, Personal Directory Information, Government-Issued	Health Information	
Italy, Spain Branches]		RGA Enterprise Services Company [United States]	Processor		Identification Numbers, Employment Information, Financial-Related Information	
		RGA UK Services Limited [United Kingdom]	Controller and Processor			
		RGA International Corporation [Canada]	Processor			
RGA Administration International Reinsurance Company dac [France, Ireland, Italy,	RGA Americas Reinsurance Company, Ltd. [Bermuda]	Controller	Policyholders, Beneficiaries	Policy Details, Personal Characteristics, Name and Initials, Financial Related Information, Employment Information, Government-Issued	Health Information	
Netherlands Branches]		RGA International Reinsurance Company dac, U.K. Branch Office [United Kingdom Branch]	Controller		Identification Numbers, Personal Directory Information, Children Information, Segmentation Attributes	

From RGA (EEA) Entity	Purpose for BCR / After Transfer	To RGA (Non- EEA) Entity [Country]	RGA (Non- EEA) Entity acting as	Data Subject Categories	Data Elements - Personal Data	Data Elements - Special Category Personal Data
		RGA UK Services Limited [United Kingdom]	Controller and Processor			
		RGA Enterprise Services Company [United States]	Processor			
		RGA International Corporation [Canada]	Processor			
		RGA Reinsurance Company of South Africa Limited [South Africa]	Processor			
RGA International Reinsurance Company dac	For the administration of reinsurance products	RGA Americas Reinsurance Company, Ltd. [Bermuda]	Controller	Policyholders, Beneficiaries	Policy Details, Personal Characteristics, Name and Initials, Personal Directory Information, Government-Issued	Health Information
[Germany, Ireland, Italy, Netherlands, Poland, Spain		RGA UK Services Limited [United Kingdom]	Controller and Processor		Identification Numbers, Employment Information, Children Information, Financial-Related Information, Segmentation Attributes, Education, Device Information	
Branches]		RGA Enterprise Services Company [United States]	Processor			
	RGA International Reinsurance Company dac [United Kingdom Branch]	Controller				
		RGA International Corporation [Canada]	Processor			
		RGA Life Reinsurance Company of	Processor			

From RGA (EEA) Entity	Purpose for BCR / After Transfer	To RGA (Non- EEA) Entity [Country]	RGA (Non- EEA) Entity acting as	Data Subject Categories	Data Elements - Personal Data	Data Elements - Special Category Personal Data
		Canada [Canada]				
RGA International Reinsurance Company dac [France	For the administration of reinsurance products	RGA ATLANTIC REINSURANCE COMPANY LTD. [Barbados]	Controller	Policyholders, Beneficiaries	Policy Details, Personal Characteristics, Government-Issued Identification Numbers, Name and Initials	Health Information
Branch]		RGA Enterprise Services Company [United States]	Processor			
		RGA UK Services Limited [United Kingdom]	Processor			
		RGA International Corporation [Canada]	Processor			
RGA International Reinsurance Company dac [EU Branches]	To perform meaningful analysis to improve employee programs, workplace practices, and policies	RGA Enterprise Services Company [United States]	Controller	Workforce Members	Name and Initials, Employment Information, Personal Characteristics, Personal Directory Information	Racial or Ethnic Origin
RGA International Reinsurance Company Designated	Audit	RGA Enterprise Services Company [United States]	Controller and Processor	Workforce Members, Policyholders, Borrows	Personal Characteristics, Name and Initials, Personal Directory Information, Education, Employment Information, Financial-Related Information, Policy Details	Health Information
Activity Company [Ireland]		RGA UK Services Limited [United Kingdom]	Controller and Processor	(Lenders), Job Applicants, Business Clients		
		RGA Reinsurance Company Hong Kong Branch [Hong Kong]	Controller			
		RGA Reinsurance Company of Australia Limited [Australia]	Controller			

From RGA (EEA) Entity	Purpose for BCR / After Transfer	To RGA (Non- EEA) Entity [Country]	RGA (Non- EEA) Entity acting as	Data Subject Categories	Data Elements - Personal Data	Data Elements - Special Category Personal Data
		RGA International Corporation [Canada]	Processor			
		RGA Partners Japan GK [Japan]	Processor			
RGA International Reinsurance Company	HR - Training	RGA Enterprise Services Company [United States]	Controller and Processor	Workforce Members, Senior Level Executives	Name and Initials, Personal Directory Information, Personal Characteristics, Employment Information, Device Information	N/A
dac [EU Branches]		RGA UK Services Limited [United Kingdom]	Processor			
		RGA International Corporation [Canada]	Processor			
RGA International Reinsurance Company Designated	Retrocession	RGA Enterprise Services Company [United States]	Controller and Processor	Policyholders, Children	Name and Initials, Personal Characteristics, Smoker Status	N/A
Activity Company [Ireland, France Branches]		RGA UK Services Limited [United Kingdom]	Processor			
		RGA International Corporation [Canada]	Processor			
		RGA International Reinsurance Company dac [United Kingdom Branch]	Controller			
		Reinsurance Group of America, Incorporated [United States]	Controller			
		RGA Reinsurance Company [United States]	Controller			

From RGA (EEA) Entity	Purpose for BCR / After Transfer	To RGA (Non- EEA) Entity [Country]	RGA (Non- EEA) Entity acting as	Data Subject Categories	Data Elements - Personal Data	Data Elements - Special Category Personal Data
RGA International Reinsurance Company dac [EU Branches]	To manage RGA's risk environment	RGA Enterprise Services Company [United States]	Controller	Workforce Members	Employment Information, Personal Characteristics, Personal Directory Information, Name and Initials,	Trade-Union Membership, Religious or Philosophical Beliefs, Political Affiliations or Opinions
RGA International Reinsurance Company Designated Activity Company [Ireland]	To manage expenses	RGA Reinsurance Company of South Africa Limited [South Africa]	Controller	Workforce Members	Name and Initials, Personal Directory Information, Employment Information	N/A
RGA International Reinsurance Company dac [France, Germany, Italy, Netherlands, Poland, Spain Branches]	Management of RGA events for attendees	RGA Enterprise Services Company [United States]	Controller	Potential Business Clients, Business Clients, Consumers, Workforce Members	Name and Initials, Personal Directory Information, Opt In / Opt Out Choice, Employment Information, Personal Characteristics, Dietary Restrictions / Food Allergies, Device Information	N/A
RGA International Reinsurance Company dac [France, Germany, Ireland, Italy, Spain Branches]	Valuation of Insurance Policies	RGA Enterprise Services Company [United States] RGA International Corporation [Canada]	Processor Processor	Policyholders, Beneficiaries	Personal Characteristics, Policy Details, Children Information, Smoker Status	N/A
		RGA UK Services Limited [United Kingdom]	Processor			
RGA International Reinsurance Company dac [France,	Regulatory Compliance	RGA Enterprise Services Company [United States]	Controller and Processor	Board of Directors, Senior-Level Executives, Workforce	Name and Initials, Emloyment Information, Personal Directory Information, Financial- Related Information,	N/A
Germany, Italy, Poland,		RGA UK Services Limited [United Kingdom]	Controller and Processor	Members, Policyholders,	Policy Details, Children Information,	

From RGA (EEA) Entity	Purpose for BCR / After Transfer	To RGA (Non- EEA) Entity [Country]	RGA (Non- EEA) Entity acting as	Data Subject Categories	Data Elements - Personal Data	Data Elements - Special Category Personal Data
Spain Branches]		RGA Americas Reinsurance Company, LTD. [South Africa Branch]	Controller	Business Clients	Government-Issued Identification Numbers	
		RGA Reinsurance Company of South Africa Limited [South Africa]	Controller			
		RGA International Corporation [Canada]	Processor			
		RGA International Division Sydney Office Pty Limited [Australia]	Controller			
RGA International Reinsurance Company dac [France,	To offer our products and services	RGA International Corporation [Canada]	Processor	Business Clients, Potential Business Clients	Personal Characteristics, Personal Directory Information, Employment Information, Visitor Report/Log, Opt In / Opt	Racial or Ethnic Origin
Germany, Ireland, Italy, Netherlands Branches]		RGA Enterprise Services Company [United States]	Controller		Out Choice, Name and Initials, Device Information	
RGA International Reinsurance Company dac [France Branch]	Pricing of reinsurance Products	RGA Atlantic Reinsurance Company Ltd. [Barbados]	Controller	Policyholders	Personal Characteristics, Employment Information, Policy Details, Personal Directory Information, Financial-Related Information, Name and Initials	N/A
International re Reinsurance Pr Company	Pricing of reinsurance Products	RGA Enterprise Services Company [United States]	Processor	Policyholders	Personal Characteristics, Personal Directory Information, Policy Details, Employment	N/A
Netherlands, Poland, Spain Branches]	Poland, Spain	RGA UK Services Limited [United Kingdom]	Processor		Information, Smoker Status, Name and Initials, Education [Spain], Financial-Related Information	
		RGA International Corporation [Canada]	Processor			

From RGA (EEA) Entity	Purpose for BCR / After Transfer	To RGA (Non- EEA) Entity [Country]	RGA (Non- EEA) Entity acting as	Data Subject Categories	Data Elements - Personal Data	Data Elements - Special Category Personal Data
RGA International Reinsurance Company dac [Italy Branch]	Pricing of reinsurance Products	RGA Americas Reinsurance Company, Ltd. [Bermuda]	Controller	Policyholders, Consumers, Beneficiaries	Policy Details, Personal Characteristics, Name and Initials, Employment Information, Children Information, Segmentation Attributes, Government-Issued Identification Number, Financial-Related Information	Health Information
RGA International Reinsurance Company dac [Ireland,	To develop and enhance pricing models	RGA Enterprise Services Company [United States]	Processor	Policyholders, Beneficiaries	Personal Characteristics, Personal Directory Information, Policy Details, Employment Information	N/A
Netherlands Branch]		RGA UK Services Limited [United Kingdom]	Processor		momation	
		RGA International Corporation [Canada]	Processor			
RGA International Reinsurance Company dac [EU Branches]	Aggregation of risk and client pricing	RGA Enterprise Services Company [United States]	Controller	Policyholders	Policy Details, Personal Characteristics, Occupation / Risk Industry	Health Information
RGA International Reinsurance Company	Checking for potential fraud, sanctions, credit, anti-	RGA Enterprise Services Company [United States]	Processor	Policyholders, Brokers, Beneficiaries	ers, Initials, Personal	Criminal Convictions
dac [EU Branches]	money laundering and other crime	RGA UK Services Limited [United Kingdom]	Processor			
		RGA International Corporation [Canada]	Processor			
		RGA Partners Japan GK [Japan]	Processor			
RGA International Reinsurance Company	HR - Employee Management	RGA Enterprise Services Company [United States]	Controller and Processor	Workforce Members	Name and Initials, Employment Information. Education, Personal Characteristics,	N/A

From RGA (EEA) Entity	Purpose for BCR / After Transfer	To RGA (Non- EEA) Entity [Country]	RGA (Non- EEA) Entity acting as	Data Subject Categories	Data Elements - Personal Data	Data Elements - Special Category Personal Data
dac [EU Branches]		RGA International Corporation [Canada]	Processor		Government-Issued Identification Numbers, Personal Directory Information, Financial- Related Information	
RGA International Reinsurance Company	HR - Recruitment	RGA Enterprise Services Company [United States]	Controller	Workforce Members, Job Applicants	Personal Directory Information, Government-Issued Identification Numbers,	Criminal Convictions, Trade Union Membership
dac [EU Branches]		RGA International Corporation [Canada]	Processor		Employment Information, Name and Initials, Financial-Related Information, Device Information, Education,	
		RGA UK Services Limited [United Kingdom]	Processor		Personal Characteristics	
RGA International Reinsurance Company dac [EU		Name and Initials, Employment Information	N/A			
Branches]	interesting and collaborative working environment	RGA International Corporation [Canada]	Processor			
RGA International Reinsurance Company	Ensure accuracy of RGA records	RGA Enterprise Services Company [United States]	Processor	Workforce Members	Name and Initials, Employment Information, Government-Issued Identification Numbers,	N/A
dac [Spain Branch]		RGA International Corporation [Canada]	Processor		Personal Directory Information	
RGA International Reinsurance Company dac [EU	Reimbursement of Workforce Expenses	of Workforce Services	Controller	Workforce Members, Business Clients	Name and Initials, Personal Directory Information, Employment Information, Device	N/A
RGA UK Controller Services Limited [United Kingdom]	Controller		Information, Financial Information			
RGA International Reinsurance Company	To pay invoice for services rendered	RGA Enterprise Services Company [United States]	Controller	Workforce Members, Business Clients	Name and Initials, Personal Directory Information, Employment Information, Device	N/A

From RGA (EEA) Entity	Purpose for BCR / After Transfer	To RGA (Non- EEA) Entity [Country]	RGA (Non- EEA) Entity acting as	Data Subject Categories	Data Elements - Personal Data	Data Elements - Special Category Personal Data
dac [EU Branches]		RGA International Corporation [Canada]	Processor		Information, Financial Information, Policy Details	
RGA International Reinsurance Company dac [EU	HR - Payroll	RGA Enterprise Services Company [United States]	Processor	Workforce Members	Name and Initials, Employment Information, Financial Information, Personal Characteristics, Personal Directory	N/A
Branches]		RGA International Corporation [Canada]	Processor		Information, Government Issued Identification Numbers, Policy Details	
		RGA UK Services Limited [United Kingdom]	Processor			
RGA International Reinsurance Company	International security of our Reinsurance premises,	RGA Enterprise Services Company [United States]	Controller	Workforce Members, Business Clients, Office Visitors	Name and Initials, Device Information, Personal Directory Information, Employment Information, Visitor Report / Log, Government-Issued Identification Number	N/A
		RGA UK Services Limited [United Kingdom]	Controller and Processor			
		RGA Technology Partners, Inc. [United States]	Controller			
		RGA International Corporation [Canada]	Processor			
RGA International Reinsurance Company dac [EU Branches]	Administration of Industry Training	RGA Enterprise Services Company [United States]	Controller	Business Clients, Workforce Members	Name and Initials, Employment Information, Personal Directory Information	N/A
RGA International Reinsurance Company dac [EU Branches]	Marketing of products, services and events	RGA Enterprise Services Company [United States]	Controller Controller	Consumers, Potential Business Clients, Business Clients	Personal Directory Information, Opt In / Opt Out, Name and Initials, Employment Information, Device Information	N/A
		International Corporation [Canada]				

From RGA (EEA) Entity	Purpose for BCR / After Transfer	To RGA (Non- EEA) Entity [Country]	RGA (Non- EEA) Entity acting as	Data Subject Categories	Data Elements - Personal Data	Data Elements - Special Category Personal Data
RGA International Reinsurance Company dac [EU	Underwriting of Insurance Policies	RGA Enterprise Services Company [United States]	Processor	Policyholders	Employment Information, Personal Characteristics, Personal Directory Information, Name and Initials, Policy Details, Financial Related Information, Segmentation Attributes, Government Issued	Health Information, Transgender Information, Criminal
Branches]		RGA UK Services Limited [United Kingdom]	Processor			Convictions, Genetic Data, Racial or Ethnic Origin,
		International	Identification Numbers, Children Information, Education	Sexual Behaviour or Sexual Preference		
		RGA International Reinsurance Company dac [Singapore Branch]	Processor			
		RGA Reinsurance Company of Australia Limited [Australia]	Controller			
		RGA Life Reinsurance Company of Canada [Canada]	Processor			

Change Log

Date	Change
Oct 2024	Initial version

