Oct 2024

GLOBAL BINDING CORPORATE RULES (EU)

APPENDIX 6

COMPLAINT HANDLING PROCEDURE (PROCESSOR)

1. INTRODUCTION

1.1.1. 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 (Processor) is to describe the practical steps individuals whose Personal Information is Processed by RGA under the Processor Policy may take to submit complaints and how such complaints are dealt with by RGA.

1.2. Where RGA Processes Personal Information on behalf of a Controller, this procedure will be made available to that Controller (under the Processor Policy).

2. How individuals can bring complaints

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

3.1. 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.

3.2. 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.

3.3. 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.

4. Complaints where RGA is a Processor

4.1. Where an individual brings a complaint regarding the collection and/or use of his/her Personal Information where RGA is the Processor in respect of that information, RGA will communicate without undue delay the details of the complaint to the Controller in compliance with all applicable internal procedures and act strictly in accordance with the terms of the contract between the Controller and RGA if the Controller requires that RGA investigate the complaint.

What happens when a Controller ceases to exist?

4.2. In circumstances where a Controller has disappeared, no longer exists or has become insolvent, individuals whose Personal Information is collected and/or used in accordance with Applicable Data Protection Laws and transferred between BCR Members on behalf of that Controller have the right to bring a complaint against RGA. RGA will handle such complaints in accordance with section 3 of this Complaint Handling Procedure (Processor).

4.3. In such cases, individuals also have the right to bring a complaint to an EEA Supervisory Authority and/or to lodge a claim with a court of competent jurisdiction and this includes where they are not satisfied with the way in which their complaint has been resolved by RGA as described above. Individuals entitled to such rights will be notified accordingly as part of the complaint handling procedure.

Change Log

Date	Change
October 2021	Added 'EU' to distinguish from UK BCRs
May 2022	No updates – date refresh only
Oct 2024	Updated "Group Member" to "BCR Member" and "Data Protection Authority" to "Supervisory Authority" Added details regarding how individuals can bring complaints