

Oct 2024

GLOBAL BINDING CORPORATE RULES (EU)

APPENDIX 7

COOPERATION PROCEDURE (PROCESSOR)



1. INTRODUCTION

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 RGA BCR members ("**BCR Member**"). This Cooperation Procedure (Processor) sets out the way in which RGA will cooperate with the Supervisory Authorities in relation to the Processor Policy.

2. Cooperation Procedure

- 2.1. Where required, RGA will make the necessary Workforce Members available for dialogue with the Supervisory Authorities in relation to the Policies.
- 2.2. RGA will actively review and consider:
 - 2.2.1. any decisions made by Supervisory Authorities on any Applicable Data Protection Law issues that may affect the Policies; and
 - 2.2.2. the views of the Supervisory Authorities in connection with Binding Corporate Rules for Processors and Binding Corporate Rules for Controllers, as outlined in its published Binding Corporate Rules guidance.
- 2.3. Subject to applicable law, RGA will provide upon request copies of the results of any audit of the Policies to the Competent Supervisory Authority. RGA will provide upon request information about processing activities documented in the "In Scope Data Transfers" (Appendix 10) to a Supervisory Authority.
- 2.4. RGA agrees that any BCR Member may be audited and inspected, including where necessary on-site, for compliance with the Policies by the Competent Supervisory Authority
 - 2.4.1. For compliance with the BCR Processor Policy: by the Supervisory Authority competent for the relevant Controller on whose behalf an RGA BCR Member is Processing Personal Information.
 - 2.4.2. RGA agrees to comply with the advice and to abide by a formal decision of any Competent Supervisory Authority on any issues relating to the interpretation and application of the Policies under Applicable Data Protection Laws. Notwithstanding its right to appeal such decisions, actions will not be delayed pending any decision on whether or not to appeal or pending the outcome of any appeal.

2.5. Where BCR member(s) are in dispute with a Competent Supervisory Authority's exercise of supervision of compliance with the BCR, said dispute will be resolved by the courts of the Member State of that Supervisory Authority in accordance with that Member State's procedural law. The BCR Members agree to submit themselves to the jurisdiction of these courts.

Change Log

Date	Change
October 2021	Added 'EU' to distinguish from UK BCRs
May 2022	No updates – date refresh only
Oct 2024	<p>Capitalized terms defined in Definitions section of BCR-C Policy</p> <p>Updated 'Data Protection Authority' with 'Supervisory Authority' and removed use of 'relevant' and 'European'</p> <p>Noted that RGA will provide information to Supervisory Authorities upon request regarding processing activities documented in "In Scope Data Transfers" (Appendix 10)</p> <p>Noted that BCR Members may be inspected on-site where necessary</p> <p>Clarified that notwithstanding RGA's right to appeal decisions by a Competent Supervisory Authority, actions will not be delayed pending any decision on whether or not to appeal or pending the outcome of any appeal</p> <p>Added commitment that in the case of dispute with a Competent Supervisory Authority regarding compliance with the BCR, BCR Members agree to submit themselves to the jurisdiction of the Member State courts of said Supervisory Authority.</p>

