



**Feb 2023**

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 group members ("**Group Members**"). In order to affect 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

Individuals may bring complaints in writing by contacting RGA's Chief Privacy Officer at [privacy@rgare.com](mailto:privacy@rgare.com).

## 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.

*What is the response time?*

- 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.
- 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.

*What happens if a complainant disputes a finding?*

- 3.4 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.

- 3.5 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 A EUROPEAN DATA PROTECTION 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 data protection 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 data protection 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 Group Member in Europe, but then transferred to a Group Member outside Europe and an individual wants to make a claim against RGA, the claim may be made against the Group Member in Europe 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