1. Introduction

1.1. Reinsurance Group of America Inc.'s ("**RGA**") compliance with global data protection laws and the "Binding Corporate Rules: Controller Policy" and "Binding Corporate Rules: Processor Policy" (together the "**P[illegible]**" or, respectively, the "**C[illegible] P[illegible]**" and the "**P[illegible] P[illegible]**") is overseen and managed throughout all levels of the business by a global, multi-layered, cross-functional privacy compliance structure. Further information about RGA's Privacy Compliance Structure (Controller) is set out below and in the structure chart provided at Figure 1.

2. Chief Privacy Officer

2.1. RGA has appointed a Chief Privacy Officer who provides executive-level oversight of, and has responsibility for, ensuring RGA's compliance with Applicable Data Protection Laws and the Policies. The Chief Privacy Officer reports dir[illegible]

2.2.8. Reviewing and responding to Data Production Requests; and

2.2.9. Advising the Data Protection Team on complex Data Subject Rights requests (i.e., complex access, objection to processing or restriction of processing requests) in accordance with the Binding Corporate Rules: Data Subject Rights Procedure (Controller or Processor, as applicable) (Appendix 2).

3. Data Protection Officers

3.1. In addition to the Chief Privacy Officer (Section 2), RGA has appointed a European Data Protection Officer plus several Data Protection contacts within our various offices to further ensure compliance with Applicable Data Protection Laws and the Policies. Each of these contacts maintain a certain level of independence and report directly to the Chief Privacy Officer, and our European Data Protection Officer reports both to the Chief Privacy Officer and to the Board of Directors in Ireland.

3.2. The DPO is involved in issues that relate to the protection of Personal Information. In particular, the tasks of the DPO are:

3.2.1. To inform and advise RGA and the Workforce Members who Process and/or handle Personal Information of their obligations under Applicable Data Protection Laws;

3.2.2. To monitor compliance with Applicable Data Protection Laws, and with the policies of RGA (including the Policies) that relate to the protection of Personal Information, including the assignment of responsibilities, awareness raising, and training of Workforce Members involved in Processing operations, and the related audits;

3.2.3. To provide advice, where requested, as regards data protection impact assessments and to monitor the performance of the data protection impact assessment process;

3.2.4. To cooperate with the Supervisory Authorities;

3.2.5. To be the point of contact for the Supervisory Authorities on issues relating to Processing, including in the context of a prior consultation, and to consult, where appropriate, with regard to any other matter; and the DPO shall, in the performance of his or her tasks, have due regard to the risks associated with Processing operations, taking into account the nature, scope, context, and purposes of Processing;

3.2.6. To respond to inquiries and compliance actions relating to the Policies

4.1.4. Supporting regular audits of the Policies, coordinating responses to audit findings and supporting remediation of any issues raised by audit findings;

4.1.5. Responding to inquiries of the Supervisory Authorities where appropriate;

4.1.6. Monitoring changes to global privacy laws and ensuring that appropriate changes are made to the Policies and RGA's related policies and business practices;

4.1.7. Overseeing training for Workforce Members on the Policies and data protection legal requirements in accordance with the requirements of the Privacy Training Program (Controller or Processor, as applicable);

4.1.8. Promoting the Policies and privacy awareness across business units and functional areas through privacy communications and initiatives;

4.1.9. Evaluating privacy processes and procedures to ensure sustainability and effectiveness;

4.1.10. Periodic reporting on the status of the Policies to the Chief Privacy Officer and Board of Directors and / or Audit Committee, as appropriate;

4.1.11. Ensuring that the commitments made by RGA in relation to updating, and communicating updates to the Policies as set out in the Binding Corporate Rules: Updating Procedure (Controller or Processor, as applicable), are met;

4.1.12. Overseeing compliance with the Data Subject Rights Procedure (Controller or Processor, as applicable) and the handling of requests made thereunder; and

4.1.13. Dealing with any privacy complaints in accordance with the Binding Corporate Rules: Complaint Handling Procedure (Controller or Processor, as applicable) (Appendix 6).

4.2. In addition to its responsibilities as a member of the Data Protection Team outlined above, RGA's Global Data Protection Office also has a number of specific responsibilities in relation to the implementation and oversight of the Policies and privacy matters more generally, including:

4.2.1. Monitoring attendance of privacy training courses as set out in the Privacy Training Program (Controller or Processor, as applicable);

4.2.2. Performing audits and/or overseeing independent audits of compliance with the Policies as set out in the Audit Protocol and will ensure that such audits address all aspects of the Policies; and

4.2.3. Ensuring that any issues or instances of non-compliance with the Policies are brought to the attention of RGA's Data Protection Team and the Chief Privacy Officer and that any corrective actions are determined and implemented within a reasonable time.

APPENDIX 3 - PRIVACY COMPLIANCE STRUCTURE (EU CONTROLLER)