



BINDING CORPORATE RULES (EU):

APPENDIX 4

PRIVACY TRAINING PROGRAM (PROCESSOR)



- 3.2.2 as part of a regular refresher training at least once every two years (the timing of which is determined by RGA's Data Protection Team); and
    - 3.2.3 when necessary based on changes in the law or to address any compliance issues arising from time to time.
  - 3.3 Certain Workforce Members will receive specialist training, including those who are involved in particular Processing activities such as those who work in HR Business Development, Operations, Claims, Underwriting, Pricing, GFS and RGAX, or whose business activities include Processing Sensitive Personal Information. Specialist training is delivered in the form of additional modules to the basic training package, which will be tailored depending on the course participants.
- 4.1 RGA's training on the Policies will cover the following main areas:
- 4.1.1 Background and rationale:
    - a) What is data protection law?
    - b) How data protection law will affect RGA internationally.
    - c) The scope of the Policies.
    - d) Terminology and concepts.
  - 4.1.2 The Policies:
    - a) An explanation of the Policies.
    - b) Practical examples.
    - c) The rights that the Policies give to individuals.
    - d) The privacy implications arising from Processing Personal Information for clients.
  - 4.1.3 Where relevant to a Workforce Member's role, training will cover the following procedures under the Policies:
    - a) Data Subject Rights Procedure (Controller or Processor, as applicable).
    - b) Updating Procedure (Controller or Processor, as applicable).
    - c) Cooperation Procedure (Controller or Processor, as applicable).
    - d) Complaint Handling Procedure (Controller or Processor, as applicable).

Any queries about training under the Policies should be addressed to RGA's Data Protection Team at [privacy@rgare.com](mailto:privacy@rgare.com).

Change Log

| Date         | Change                                 |
|--------------|----------------------------------------|
| October 2021 | Added 'EU' to distinguish from UK BCRs |
| May 2022     | No updates – date refresh only         |
| Feb 2023     | No updates – date refresh only         |