



BINDING CORPORATE RULES (UK):

APPENDIX 6

COMPLAINT HANDLING PROCEDURE (UK) (PROCESSOR)



*Who handles complaints?*

- 5.1 RGA's Data Protection Team will handle all complaints arising under the Processor Policy. RGA's Chief Security and 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?*

- 5.2 RGA's Data Protection Team will acknowledge receipt of a complaint to the Data Subject concerned within 5 working days by sending a Complaint Receipt and Acknowledgment response email to the complainant Data Subject. 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.
- 5.3 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 Data Subject without unreasonable delay and RGA shall at all times consider the interests of the Data Subject.
- 5.4 If the complaint is upheld, the Chief Security and Privacy Officer will arrange for any necessary steps to be taken as a consequence.

*What happens if a complainant disputes a finding?*

- 5.5 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 Security and Privacy Officer. The Chief Security and 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 Security and Privacy Officer will respond to the complainant within one month of the receipt of the complaint. As part of the review, the Chief Security and Privacy Officer may arrange to meet with the complainant. 6.6 (b) 5202 (S) 23 (e) 11 04 2019 10:25 To