



RGA Speak-Up Hotline Privacy Notice

We are committed to protecting personal information that we receive through our Speak-Up Hotline. We maintain transparent practices about the collection, processing, and sharing of that information. Protecting individuals' privacy is very important to us.

In support of RGA's Code of Conduct, we rely on each Workforce Member to maintain high standards and conduct business – wherever we do business – with honesty and integrity. RGA has established a Speak-Up Hotline to provide our Workforce Members with the information and resources they may need to report conduct, activities, or behaviors the Workforce Member may believe are inconsistent with applicable laws and regulations, RGA's Code of Conduct or any of RGA's policies and procedures.

This privacy notice is designed to explain how and why the Reinsurance Group of America, Incorporated, and its subsidiaries and affiliates ("RGA", "we" or "us") collect personal information and how we use it when submissions are made to RGA's Speak-Up Hotline.

Who is RGA?

RGA is a group of companies which operate globally focusing primarily on life- and health-related reinsurance solutions, such as life reinsurance, living benefits reinsurance, group reinsurance, and health reinsurance.

The headquarters of Reinsurance Group of America, Incorporated are located in St. Louis, Missouri, United States of America.

RGA International Reinsurance Company dac located in Dublin, Ireland is our representative in the European Economic Area ('EEA').

Other RGA group entities operate and provide products and services all over the world. A full list of all RGA entities is available at <https://www.rgare.com/global-presence/global-presence-landing>.

Reinsurance Group of America, Incorporated is the ultimate parent company of the RGA group. Regional or service related RGA companies are generally the Controller for Data Protection Purposes in the regions where they operate. For the EU and UK the Data Controller for RGA's Reinsurance business is RGA International Reinsurance Company dac (Dublin). To simplify contact with us, where related to data protection, you can contact us at privacy@rgare.com.

Application of privacy laws

This privacy notice is designed to provide compliance with relevant laws in countries where RGA entities operate.

RGA handles personal information in accordance with multiple local privacy laws at the place where the personal information is collected and processed. If applicable laws provide for a lower level of protection of personal information than that established by this privacy notice, then this privacy notice shall prevail.

What do we mean by "personal information"?

Personal information means information, or a combination of pieces of information, that could reasonably allow an individual to be identified.

How do we collect personal information?

We obtain your personal information directly from you at the time of submission via our online form, phone, mail or local reporting options.

If allowed under local law, you may select to remain anonymous when making your report. If this is selected, your personal data will not be collected.

What types of personal information do we collect and process?

The Speak-Up Hotline captures the following personal data that you provide, or someone else may provide, when a report is made: (i) your name and contact details (unless you report anonymously) and whether you are employed by RGA; (ii) the name and other personal data of the persons named in the report if provided (i.e.: description of functions and contact details); and (iii) a description of the alleged misconduct as well as a description of the circumstances of the incident, this description must be factual and have a direct and immediate link to the incident.

Note that depending upon the laws of the country in which you are residing, the report may not be made anonymously; however, your personal data will be used and disclosed only as described in this Privacy Notice.

For what purposes do we use your personal information?

Your personal data will be used and disclosed for the purpose of processing and investigating the report, for the administration and monitoring of the Speak-Up Hotline, and for conducting internal investigations regarding compliance with law and RGA policies and procedures. RGA may need to disclose your personal data in order to comply with a legal obligation or demand. In such instances, we will take measures to protect your personal data to the extent possible. We also reserve the right to use personal data to investigate and prosecute users who violate our rules or who engage in behavior that is illegal or harmful to others or to others' property.

What are the legal bases on which we use your personal information?

We are committed to processing your personal information fairly and lawfully and only to the extent necessary to achieve the purposes listed above.

We must have a legal basis to process your personal information. In most cases, our ability to obtain and process your personal information is based on one of the following:

- Your consent. If we ask for your consent to process your personal information, you may withdraw your consent at any time by contacting us at the details contained in the "Contact us" section below.
- To comply with our legal obligations; or
- To meet our legitimate interests, in protecting employees, property, and data. When we process personal information to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms. If you wish to obtain further information concerning the balancing test that we carry out, please contact us at the details contained in the "Contact us" section below.

With whom do we share personal information?

Personal data may be accessed, processed and used by relevant personnel of RGA, including human resources, finance, internal audit, legal, the office of global ethics and compliance, management, RGA external advisors (e.g. legal advisors; audit firms).

RGA has a relationship with NAVEX Global to operate and administer the Speak-Up Hotline. RGA will not authorize NAVEX Global to use your personal data for any purpose that is not related to your report, and RGA requires NAVEX Global to handle your Personal Data collected through the Speak-Up Hotline in accordance with appropriate contractual privacy and security provisions and this Privacy Notice.

Personal data provided in a report may also be disclosed to the police and/or other enforcement, regulatory or judicial authorities.

What rights do individuals have in relation to the information we hold?

You have certain rights regarding your personal information, subject to local laws and circumstances relating to the processing of your personal data.

Your rights include the right to:

- ask us to confirm whether your personal information is being processed, and access your personal information and details concerning its processing (**right of access**);
- rectify any inaccurate information we hold about you (**right to rectification**);
- erase your personal information (**right to erasure**);
- restrict the processing of your personal information (**right to restriction of processing**);
- object to our processing of your personal information (**right to object**);
- withdraw your consent in relation to processing your personal information (where we rely on your consent as our legal basis for processing) (**right to withdraw your consent**);
- receive your personal information in a usable electronic format and transmit it to a third party (**right to data portability**); and
- lodge a complaint with your local data protection authority.

If you would like to discuss or exercise such rights, please contact the HR department or the Global Privacy & Security Office (GSPO) at dsr@rgare.com, or by using the contact details provided in section 'Contact us' below.

We are committed to working with you to obtain a fair resolution of any request, complaint or concern about privacy. If, however, you believe that we have not been able to assist with your request, complaint or concern, you have the right to make a complaint to your local supervisory authority (i.e. the supervisory in the jurisdiction where you live or work) or the supervisory authority of the jurisdiction where you believe an infringement of data protection laws has occurred. Contact details of supervisory authorities are available at the following link: <https://www.rgare.com/our-company/responsibility/policies-and-governance-center/policy-and-rights/supervisory-authorities-contacts>

How do we protect personal information?

We implement technical and organizational measures to ensure a level of security appropriate to the risk to the personal information we process. These measures are aimed at ensuring the on-going availability, integrity, and confidentiality of personal information. We evaluate these measures on a regular basis to ensure the security of the processing.

How long do we retain personal information for?

RGA will not keep personal data longer than is necessary to investigate the report provided to the Speak-Up Hotline, or otherwise as necessary to comply with legal or regulatory requirements.

We will delete your personal information when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the data.

Where do we process your personal information?

Because we operate as a global business, your personal information may be transferred to, stored, and processed by RGA entities in other countries, which may include countries that are not regarded as ensuring an adequate level of protection for personal information under the European Union or your local law. Therefore, RGA has adopted Binding Corporate Rules ('BCRs') to enable us to make international transfers of your personal information within our group of companies in compliance with data protection laws of the European Union and other relevant countries. Summaries of our BCRs are available at <https://www.rgare.com/our-company/responsibility/policies-and-governance-center/policy-and-rights>

Transfer your personal information to service providers or other parties located outside the EEA or other relevant countries, we will make sure that adequate safeguards are in place with those parties. We put in place contractual commitments in accordance with applicable legal requirements to ensure that your personal information is adequately protected. For more information on the appropriate safeguards in place, please contact us at the details contained in the "Contact us" section below.

Contact Us

If you have questions or concerns regarding the way in which your personal information has been used, please e-mail us at privacy@rgare.com, or call or write to us.

Our Ireland (representative in EEA) postal address is:

RGA International Reinsurance Company dac
3rd Floor, Block C
Central Park
Leopardstown, Dublin 18, D18 X5T1

Our Ireland telephone number is:

+353 1.290.2900

Our United Kingdom postal address is:

RGA International Reinsurance Company dac, UK
Branch Office
RGA UK Services Limited
Level 45, 22 Bishopsgate
London, EC2N 4BQ

Our United Kingdom telephone number is:

+44 20 7710 6700

Our South Africa postal address is:

RGA Reinsurance Company of South Africa
Limited

Our South Africa telephone number is:

Cape Town Office

7th Floor, The Terraces, Black River Park
2 Fir Street, Observatory, 7925, Cape Town

+27 21.486.1700

Johannesburg Office

1st Floor, Sentinel House, Sunnyside Office Park
32 Princess of Wales Terrace, Parktown, 2193,
Johannesburg

+27 11.484.0577

For all other postal addresses and telephone numbers, please see <https://www.rgare.com/global-presence/global-presence-landing>

If you would like to exercise a data subject right, you may use our [online contact form](#).

Our data protection officer: RGA's Data Protection Officer for the EMEA region is Dean Scotson. Should you have any questions or concerns for our DPO regarding the way in which your personal information has been used, please contact him via email at dpo@rgare.com.

How do we make changes to this privacy notice?

You may request a copy of this privacy notice from us using the contact details set out above. We may modify or update this privacy notice from time to time. If we make a significant change to this privacy notice, we will notify you and, where appropriate, give you sufficient advance notice so that you have the opportunity to exercise your rights (e.g. to object to the processing).

Last Updated: October 2023