

## **RGAX Privacy Policy**

Thank you for visiting RGAX!

We are committed to protecting the information that you share with us, and explaining how we collect, process, and share that information online. Protecting your privacy is very important to us. We want you to understand what information we collect and how we use it. We treat nonpublic personal information in accordance with our Privacy Policy.

### **What information does this Privacy Policy cover?**

This Privacy Policy applies to Personal Information collected on websites, mobile applications, or controlled widgets embedded in communication platforms with a link to this Privacy Policy (“Sites”). It does not apply to any other information collected by the RGAX, and its subsidiaries and affiliates (collectively referred to herein as “RGAX”) through any other means. By “Personal Information,” we mean information that identifies you personally. It covers how we collect, use, and share that Personal Information as of the date that this Privacy Policy is posted. This Policy also does not apply to any Sites maintained or operated by other companies or linked to our Sites.

### **What types of personal information do we collect about our online visitors?**

We restrict access to your nonpublic personal information and only allow disclosures to persons and companies as permitted by law to assist in providing products or services to you. We maintain physical, electronic, and procedural safeguards to protect your nonpublic personal information.

We generally collect only Personal Information you voluntarily provide to us. We do not require you to give us Personal Information to access public areas of our Site. This is true unless you live in a country that defines Personal Information to include network identifiers like your Internet Protocol addresses. Certain secure web areas, however, enable or require you to provide Personal Information when you use specific features on our Site. For example, we collect Personal Information from you when you:

1. Ask to register for an account with us;
2. Request a product demo or receive information about our products;
3. Request customer or technical support;
4. Ask to have an RGAX representative contact you.

This Personal Information, for example, may include your:

1. Name;
2. Postal address;
3. E-mail address; and
4. Telephone or fax number.

If you cannot or choose not to provide us with the Personal Information we reasonably require, we may be unable to provide you with the information or services you have requested.

No sensitive or special category information is collected by this website.

### **Do we advertise online?**

We advertise in a number of ways, primarily through managed social media presences and email marketing campaigns. To understand how our advertising campaigns are performing, we may collect certain information via our Sites through our service providers. We or our vendors use several common online tracking tools to collect this information, such as browser and flash cookies, web beacons and other, similar technologies. The information we collect includes IP addresses, the number of page visits, pages viewed via our Sites, search engine referrals, browsing activities over time and across other websites following your visit to one of our Sites or applications, and responses to direct email marketing campaigns.

We also use certain information to:

- Identify new visitors to our Sites;
- Recognize returning visitors;
- Analyze the effectiveness of our promotional content;
- Better understand our audience, customers, or other Site visitors; and
- Determine whether you might be interested in new products or services.

### **Legal basis of processing 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 legal bases:

- (a) Processing your personal information is necessary to meet our legitimate interests, for example to provide our services to clients, to improve our services, to manage risk, to manage our business efficiently, to perform audits, and to maintain accurate records.
- (b) Your explicit consent has been obtained. You may withdraw your consent from communications at any time by clicking the unsubscribe link at the bottom of our emails.

### **Controlling our tracking tools**

RGAX uses cookies on its website. Cookies are text files containing small amounts of information which are downloaded to your computer or mobile device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie. Cookies are useful because they allow a website to recognize a user's device. Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improving the user experience. They can also help to ensure that adverts you see online are more relevant to you and your interests.

## **Minors and children under 13**

Our Sites are not intended for minors. We do not knowingly collect any Personal Information from children under the age of 13 or knowingly track the use of our Sites by minors.

## **How we use and share your personal information?**

Whatever the purpose may be – whether we share with service providers or other external entities – we only process and share your Personal Information to the extent reasonably necessary to fulfill your requests and our legitimate business objectives. When we disclose Personal Information to external entities to perform support services for us, they may access your Personal Information only for the limited purposes of performing those support services. We may also use what we know about you to offer you other products and services. We may combine your online information with information collected from offline sources or information we already have. We may also use and disclose certain Personal Information to our affiliates and others for any purpose allowed by law.

**RGAX business activities.** We process and may disclose your Personal Information to others to:

- Respond to your questions about our product or services;
- Send you communications, including event promotions and electronic newsletters;
- Comply with applicable law, obey judicial orders, cooperate with law enforcement authorities, or prevent any suspected illegal activities;
- Help us run our business; or
- For any other everyday legitimate business purposes, such as product development and Site administration.

**Authorized service providers.** We use other companies and individuals to perform certain functions on our behalf. Those functions include call-center support, sending or processing postal or electronic mail, or analyzing or hosting data on cloud-based servers. We may disclose your Personal Information to these companies and other individuals performing services on our behalf.

**Other disclosures.** We may otherwise disclose Personal Information as permitted or required by law, when we believe in good faith it is necessary for safety purposes, required for legal reporting, or to protect our legal rights or enforce our Terms of Use or any applicable rules, or to protect the rights of others. We may also disclose Personal Information to our auditors, legal advisors, or to respond to a subpoena. We may also aggregate information that we gather about you, product information, traffic patterns, and services, and provide these statistics to others in aggregate form.

## **Do we share of your personal information?**

We **do not** share your Personal Information with unaffiliated third parties for their own direct marketing purposes.

## **What kinds of security measures do we take to safeguard your personal information?**

The security and confidentiality of your Personal Information matters to us. That is why we have technical, administrative and physical controls in place to protect your Personal Information from unauthorized access, use and disclosure. We review our security procedures periodically to consider appropriate new technology and updated methods. Even so, despite our reasonable efforts, no security measure is ever perfect or impenetrable.

## **How can you access, update or block your personal information?**

You have certain rights regarding your personal information, subject to local law. These include the right to:

- access your personal information;
- rectify the information we hold about you;
- erase your personal information;
- restrict our use of your personal information;
- object to our use of your personal information;
- 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.

A full list of Data Protection Authorities can be found here: [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

If you would like to contact us directly to discuss or exercise your rights, you may contact us via our [online contact form](#), or using the contact details provided below.

## **How long do we retain personal information for?**

We will normally keep your personal information for as long as you have an interest in, or claim against, a product we sell. Beyond that, we retain personal information for 2 years. This reasonably allows us to investigate, commence or defend legal claims brought by or against us or our clients, comply with our regulatory obligations and conduct analysis. We securely destroy personal information when its retention period has expired.

We may retain aggregated or anonymized data (which is not treated as personal information under this privacy notice) for longer.

## **Where do we process your personal information?**

Because we operate as a global business, your personal information may be transferred to, stored, and processed in other countries, which may include countries that are not regarded as ensuring an adequate level of protection for personal information under European Union law.

We have put in place appropriate safeguards (such as 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**

RGAx is the controller responsible for the personal information we collect and process.

If you have questions or concerns regarding the way in which your personal information has been used, please e-mail us at [dataprivacy@rgare.com](mailto:dataprivacy@rgare.com) or call or write to us. Our address is:

### **Our United States postal address is:**

RGAx  
Attn.: Global Privacy Office  
16600 Swingley Ridge Road  
Chesterfield, Missouri 63017-1706

### **Our United Kingdom postal address is:**

16th Floor  
5 Aldermanbury Square  
London EC2V 7th

**For all other postal addresses, please see [rgax.com](http://rgax.com)**

### **Our telephone number is:**

+1 (636) 736-7000 (United States)  
+44 (0)20 7710-6700 (United Kingdom)

RGA has appointed Dean Scotson as its Data Protection Officer (DPO) under the GDPR. Should you have any questions or concerns for our DPO regarding the way in which your personal information has been used, please contact him at [dpo@rgare.com](mailto:dpo@rgare.com).

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your 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. Each supervisory authority may have a difference process for lodging complaints so we encourage you to contact the relevant supervisory authority first to check this.

### **How will you know if we amend this Privacy Policy?**

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 post a notice about this on our website.

You will be able to see when we last updated the privacy notice because we will include a revision date, shown below

*Last revised: July 2019*