

MERIDIAN RETAIL GROUP

Privacy Review: Meridian Rewards Loyalty Program

Custom Assessment

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Executive Summary



Assessment Type	Custom Assessment
Template	Custom Assessment v1.0
Status	PENDING REVIEW
Risk Score	45 / 100
Started	2026-01-05
Submitted	2026-02-10
Completed	—
Due Date	2026-03-05
Linked Activity	Meridian Rewards Loyalty Program

Description

Custom privacy assessment reviewing data practices for the loyalty program ahead of planned expansion to UK market.

1. Overview

Describe the scope and purpose of this assessment

2 of 2 questions answered Complete

Q1. What is the purpose of this assessment?

REQUIRED

Evaluate the privacy implications of the Meridian Rewards loyalty program, with focus on the planned UK market expansion and new personalized offers feature.

Q2. What is the scope of this assessment?

REQUIRED

Covers loyalty points accrual, tier management, reward redemptions, personalized offers based on purchase history, and cross-border data sharing with UK entity.

2. Risk Evaluation

Identify and evaluate potential risks

2 of 3 questions answered

Q1. What are the key risks identified?

REQUIRED

1. Cross-border data transfer to UK subsidiary for local program management
2. Profiling customers for personalized offers may cross into automated decision-making
3. Retention of purchase history for points calculation may exceed necessity
4. Third-party reward partners receive customer identifiers

Q2. What is the overall risk level?

REQUIRED

Medium

Q3. Are there any legal or regulatory concerns?

Not yet answered

3. Mitigations

Document mitigations and recommendations

1 of 2 questions answered

Q1. What mitigations are in place or recommended?

REQUIRED

1. UK adequacy decision provides legal basis for transfer
2. Implement opt-out for personalized offers profiling
3. Limit purchase history retention to 5 years
4. Minimize data shared with reward partners to pseudonymized IDs

Q2. Is the residual risk acceptable?

REQUIRED

Not yet answered

Risk Assessment Summary



Risk Mitigations

2 TOTAL	0 COMPLETED	2 OUTSTANDING
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Title	Status	Priority	Owner	Due Date	Evidence
Implement opt-out for personalized offers	PLANNED	P1	Engineering	2026-04-01	No
Document UK adequacy basis	IDENTIFIED	P2	Legal / Privacy	—	No

Mitigation Details

- Implement opt-out for personalized offers**

Add preference toggle allowing members to opt out of purchase-history-based personalized offers.
- Document UK adequacy basis**

Prepare documentation confirming UK adequacy decision applicability for the loyalty program data transfer.

Approval History

Level	Approver	Status	Date	Comments
Level 1	Maria Torres	PENDING	—	—