

MERIDIAN RETAIL GROUP

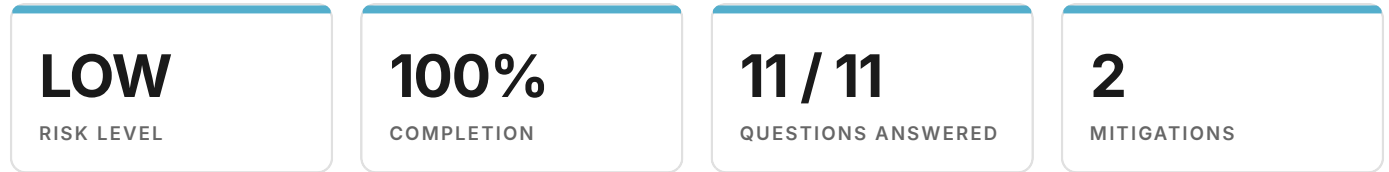
LIA: Customer Analytics & BI

Legitimate Interest Assessment

Generated: 2026-06-30

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Executive Summary



Assessment Type	Legitimate Interest Assessment
Template	Legitimate Interest Assessment v1.0
Status	APPROVED
Risk Score	22 / 100
Started	2025-08-01
Submitted	2025-08-20
Completed	2025-08-25
Due Date	2025-09-01
Linked Activity	Customer Analytics & Business Intelligence

Description

Legitimate Interest Assessment for customer behavior analytics used to improve products and optimize the shopping experience.

1. Purpose Test

Identify the legitimate interest

3 of 3 questions answered

Complete

Q1. What is the legitimate interest being pursued?

REQUIRED

Understanding customer browsing and purchase patterns to improve product recommendations, optimize website UX, and inform inventory decisions.

Q2. Is this interest recognized as legitimate under law?

REQUIRED

Yes, explicitly recognized

Q3. What benefit does pursuing this interest provide?

REQUIRED

Enables data-driven product development, reduces unsold inventory, and improves the customer experience through better recommendations.

2. Necessity Test

Assess whether processing is necessary

2 of 2 questions answered Complete

Q1. Is the processing necessary to achieve the interest?

REQUIRED

Essential

Q2. Are there less intrusive ways to achieve the same goal?

REQUIRED

No alternatives exist

3. Balancing Test

Balance interests against data subject rights

4 of 4 questions answered Complete

Q1. What is the nature of the data being processed?

REQUIRED

Non-sensitive only

Q2. Would data subjects reasonably expect this processing?

REQUIRED

Definitely expected

Q3. What is the potential impact on data subjects?

REQUIRED

Positive/Neutral

Q4. Are there vulnerable individuals affected?

REQUIRED

false

4. Safeguards

Document safeguards to protect data subjects

2 of 2 questions answered Complete

Q1. What safeguards are in place to protect data subjects?

REQUIRED

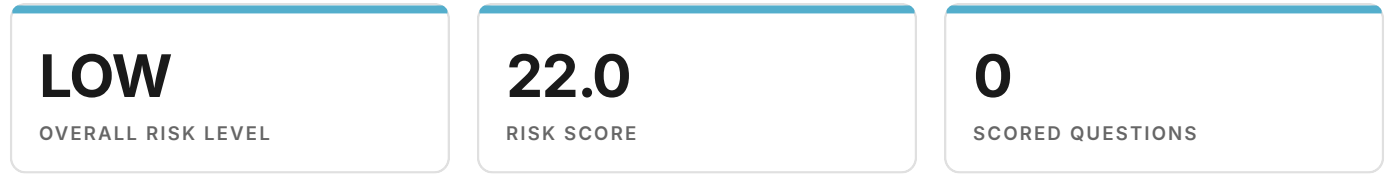
["Data minimization","Retention limits","Access controls","Transparency measures"]

Q2. Have you provided clear privacy information about this processing?

REQUIRED

true

Risk Assessment Summary



Risk Mitigations

2

TOTAL

2

COMPLETED

0

OUTSTANDING

Title	Status	Priority	Owner	Due Date	Evidence
Add analytics opt-out to privacy center	VERIFIED	P1	Engineering	—	Yes
Implement automated data purge	IMPLEMENTED	P2	Data Team	—	Yes

Mitigation Details

Add analytics opt-out to privacy center

Provide customers with a clear opt-out mechanism for behavioral analytics.

Implement automated data purge

Set up automated deletion of raw analytics data older than 2 years. Aggregated data may be retained longer.

Approval History

Level	Approver	Status	Date	Comments
Level 1	Maria Torres	APPROVED	2025-08-25	LIA demonstrates clear legitimate interest with minimal impact on data subjects. Appropriate safeguards in place.