

MERIDIAN RETAIL GROUP

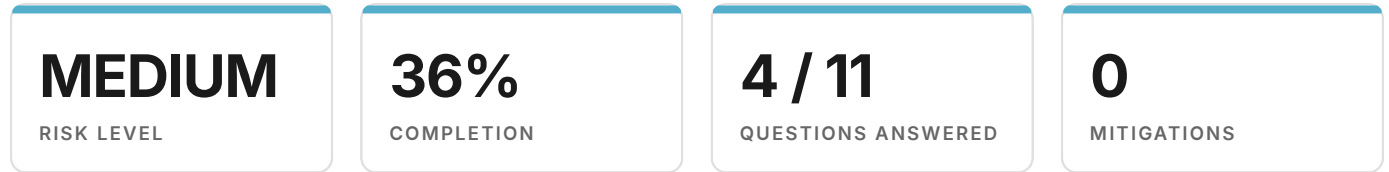
LIA: Fraud Detection & Prevention

Legitimate Interest Assessment

Generated: 2026-06-30

CONFIDENTIAL — This document contains sensitive information about data protection practices. Distribution should be limited to authorised personnel and supervisory authorities upon request.

Executive Summary



| | |
|------------------------|-------------------------------------|
| Assessment Type | Legitimate Interest Assessment |
| Template | Legitimate Interest Assessment v1.0 |
| Status | IN PROGRESS |
| Started | 2026-01-15 |
| Submitted | — |
| Completed | — |
| Due Date | 2026-03-01 |
| Linked Activity | Fraud Detection & Prevention |

Description

Legitimate Interest Assessment for automated fraud screening of e-commerce transactions.

1. Purpose Test

Identify the legitimate interest

3 of 3 questions answered Complete

Q1. What is the legitimate interest being pursued?

REQUIRED

Detecting and preventing fraudulent transactions to protect both the company and customers from financial crime.

Q2. Is this interest recognized as legitimate under law?

REQUIRED

Yes, explicitly recognized

Q3. What benefit does pursuing this interest provide?

REQUIRED

Prevents financial losses (~€1.2M annually), protects customers from unauthorized transactions, and ensures PSD2 compliance.

2. Necessity Test

Assess whether processing is necessary

1 of 2 questions answered

Q1. Is the processing necessary to achieve the interest?

REQUIRED

Essential

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

REQUIRED

Not yet answered

3. Balancing Test

Balance interests against data subject rights

0 of 4 questions answered

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

REQUIRED

Not yet answered

Q2. Would data subjects reasonably expect this processing?

REQUIRED

Not yet answered

Q3. What is the potential impact on data subjects?

REQUIRED

Not yet answered

Q4. Are there vulnerable individuals affected?

REQUIRED

Not yet answered

4. Safeguards

Document safeguards to protect data subjects

0 of 2 questions answered

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

REQUIRED

Not yet answered

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

REQUIRED

Not yet answered

Risk Assessment Summary

| | | |
|-------------------------------------|--------------------------|------------------------------|
| MEDIUM OVERALL RISK LEVEL | N/A RISK SCORE | 0 SCORED QUESTIONS |
|-------------------------------------|--------------------------|------------------------------|