

Privacy Program Report

Meridian Retail Group

2026-06-30

CONFIDENTIAL

57

DATA ASSETS

50

PROCESSING
ACTIVITIES

42

VENDORS

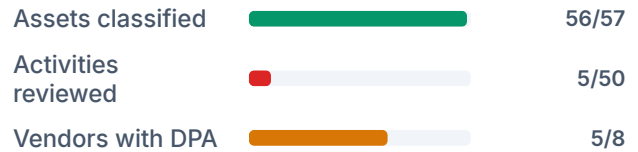
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DSARS ON TIME

KEY FINDINGS

- 3 data-subject requests are past the statutory response deadline.
- 3 active vendors (38%) have no Data Processing Agreement on file.
- 3 vendors are classified as high or critical risk — governance review recommended.
- 3 processing activities are overdue for periodic review.
- 8 special category data elements are catalogued — Article 9 safeguards apply.

DATA ENRICHMENT COVERAGE



VENDOR CATEGORIES

Personalization & Engagement 5

Customer Data Platform 4

Advertising 4

Cloud Infrastructure 3

Legal & Compliance 2

Analytics & BI 2

DATA_PROCESSING 2

Customer Support 2

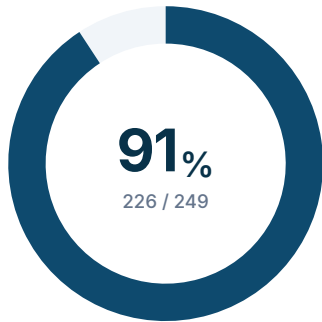
Privacy & Consent 2

Security & Identity 1

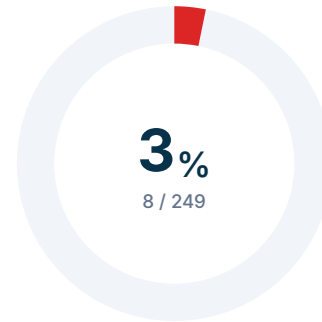
SECTION 02

Data Inventory

Overview of registered data assets, their classification density, and the share of personal and special-category data catalogued across the estate.



PERSONAL DATA
226 of 249 elements



SPECIAL CATEGORY
8 of 249 elements · Art. 9

ASSETS BY TYPE



ASSET REGISTER

NAME	TYPE	OWNER	LOCATION	ELTS	PERSONAL	ART. 9
1Password (Security & Identity)	Cloud Service	—	—	5	4	0
AB Tasty (Analytics & BI)	Cloud Service	—	—	8	7	0
AccessiWay (Legal & Compliance)	Cloud Service	—	—	4	4	0
AdTriba (Analytics & BI)	Cloud Service	—	—	8	7	0
Adobe (Design & Creative)	Cloud Service	—	—	3	2	0
Adobe Acrobat Sign (Legal & Compliance)	Cloud Service	—	—	4	4	0

Adobe CDP (Customer Data Platform)	Cloud Service	—	—	5	5	0
Adobe Experience Manager (Content & E-commerce)	Application	—	—	4	4	0
Akamai (Cloud Infrastructure)	Cloud Service	—	—	4	3	0
Analytics Warehouse	Database	Data Team	Snowflake AWS eu-west-1	2	1	0
Application Logs	Cloud Service	Engineering	—	4	3	0
Billing & Insurance System	Application	Finance	—	4	4	1
Billing System	Cloud Service	Finance	—	4	3	0
CRM	Cloud Service	Sales	HubSpot Cloud (EU)	2	2	0
Cedexis (Cloud Infrastructure)	Cloud Service	—	—	4	3	0
Client Database	Database	Business Development	—	4	3	0
Conductrics (Analytics & BI)	Cloud Service	—	—	8	7	0
Cookie Consent Platform	Third Party	Legal / Privacy	Cookiebot Cloud (EU)	2	2	0
Customer Database	Database	Engineering	AWS eu-west-1 (Ireland)	5	5	0
Document Management	Cloud Service	Operations	—	3	3	0
Dynatrace (Developer Tools)	Cloud Service	—	—	4	3	0
E-commerce Platform	Application	E-commerce	Shopify Cloud (EU)	3	3	0
Electronic Health Records (EHR)	Application	Clinical IT	—	7	7	4
Employee File Server	File System	Human Resources	Azure West Europe	2	2	0
Google Ads (Marketing & Advertising)	Cloud Service	—	—	6	5	0
Google Analytics (Analytics & BI)	Cloud Service	—	—	8	7	0
HR & Payroll System	Cloud Service	Human Resources	—	5	5	0
HR System	Application	Human Resources	BambooHR Cloud (US)	3	3	0

Help Desk	Cloud Service	Customer Support	Zendesk Cloud (UK)	2	2	0
LivePerson (Customer Support)	Cloud Service	—	—	5	5	0
Loyalty Program Database	Database	Marketing	AWS eu-west-1 (Ireland)	2	2	0
Marketing Platform	Cloud Service	Marketing	Klaviyo Cloud (US)	2	2	0
Meet Edgar (Marketing & Advertising)	Cloud Service	—	—	6	5	0
Meridian Retail Group Internal Systems	Application	—	—	0	0	0
Meta Ads (Marketing & Advertising)	Cloud Service	—	—	6	5	0
Meta Pixel (Marketing & Advertising)	Cloud Service	—	—	6	5	0
Microsoft (Cloud Infrastructure)	Cloud Service	—	—	4	3	0
OneTrust (Privacy & Consent)	Cloud Service	—	—	4	4	0
Optimizely (Analytics & BI)	Cloud Service	—	—	8	7	0
Order Management System	Application	Operations	—	4	4	0
Patient Portal	Application	Digital Health	—	4	4	2
Payment Gateway	Third Party	Finance	Stripe EU (Ireland)	2	2	0
Pinterest (Marketing & Advertising)	Cloud Service	—	—	6	5	0
Product Analytics	Cloud Service	Product	—	3	3	0
Project Management System	Cloud Service	Operations	—	4	3	0
Qualtrics (Surveys & Feedback)	Cloud Service	—	—	4	4	0
Quantum Metric (Analytics & BI)	Cloud Service	—	—	8	7	0
Rokt (Analytics & BI)	Cloud Service	—	—	8	7	0
Salesforce CDP (Customer Data Platform)	Cloud Service	—	—	5	5	0
Staff HR System	Application	Human Resources	—	4	4	1

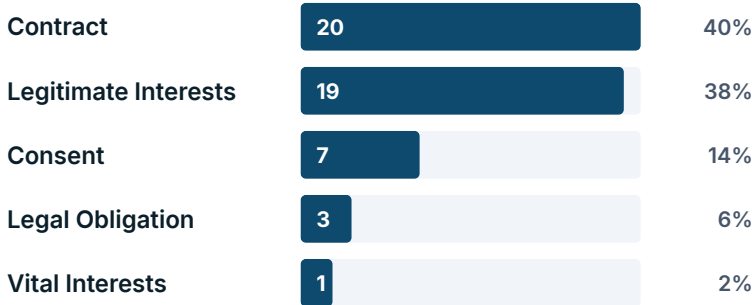
Support Ticketing System	Cloud Service	Customer Success	—	3	3	0
Tealium (Customer Data Platform)	Cloud Service	—	—	5	5	0
User Database	Database	Engineering	—	5	5	0
Warehouse Management System	Application	Operations	SAP Cloud (EU)	1	1	0
Web Analytics	Cloud Service	Marketing	—	4	4	0
mParticle (Customer Data Platform)	Cloud Service	—	—	5	5	0
securiti (Privacy & Consent)	Cloud Service	—	—	4	4	0

SECTION 03

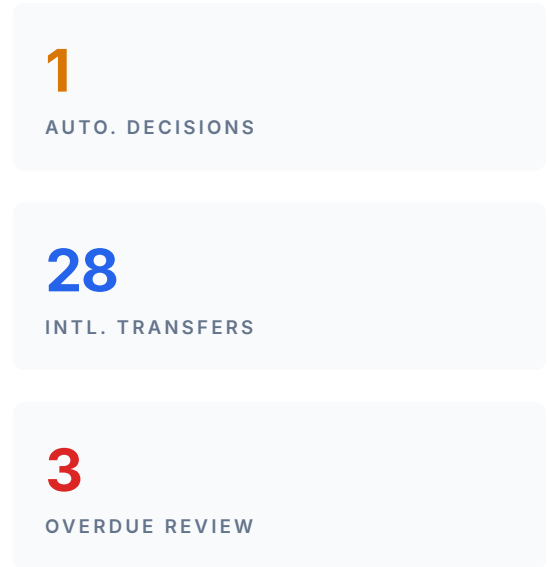
Record of Processing

Article 30 summary. For auditor-grade detail (systems, data elements, transfer safeguards), export the standalone ROPA report.

BY LEGAL BASIS



SIGNALS



ALL ACTIVITIES

ACTIVITY	LEGAL BASIS	SYSTEMS	TRANSFERS	ADM	NEXT REVIEW
Application Monitoring & DevOps — Dynatrace	Legitimate Interests	1	3	—	—
Client Relationship Management	Contract	1	—	—	—
Cloud Data Hosting — Akamai	Contract	1	5	—	—
Cloud Data Hosting — Cedexis	Contract	1	—	—	—
Cloud Data Hosting — Microsoft	Contract	1	6	—	—
Content & Commerce Management — Adobe Experience Manager	Contract	1	4	—	—
Customer Account Management	Contract	2	—	—	2026-10-01
Customer Analytics & Business Intelligence	Legitimate Interests	3	1	—	2026-05-01
Customer Data Unification — Adobe CDP	Legitimate Interests	1	2	—	—

Customer Data Unification — Salesforce CDP	Legitimate Interests	1	—	—	—
Customer Data Unification — Tealium	Legitimate Interests	1	1	—	—
Customer Data Unification — mParticle	Legitimate Interests	1	1	—	—
Customer Support	Contract	2	—	—	—
Customer Support & Service	Contract	2	1	—	2026-12-01
Customer Support Operations — LivePerson	Contract	1	4	—	—
Design Asset Management — Adobe	Legitimate Interests	1	4	—	—
Email & SMS Marketing	Consent	3	—	—	2026-08-20
Employee HR & Payroll	Contract	1	—	—	—
Employment Records Management	Contract	2	—	—	2026-06-01
Fraud Detection & Prevention	Legitimate Interests	3	—	YES	2026-05-15
Legal Document Management — AccessiWay	Contract	1	1	—	—
Legal Document Management — Adobe Acrobat Sign	Contract	1	—	—	—
Marketing & Promotions	Consent	2	—	—	—
Marketing Communications — Google Ads	Consent	1	2	—	—
Marketing Communications — Meet Edgar	Consent	1	1	—	—
Marketing Communications — Meta Ads	Consent	1	2	—	—
Marketing Communications — Meta Pixel	Consent	1	2	—	—
Marketing Communications — Pinterest	Consent	1	1	—	—
Medical Billing & Insurance	Legal Obligation	2	—	—	—
Meridian Rewards Loyalty Program	Contract	2	—	—	2026-07-10
Order Processing & Fulfillment	Contract	4	1	—	2026-09-15
Patient Care & Treatment	Vital Interests	2	—	—	—

Privacy & Consent Management — OneTrust	Legal Obligation	1	2	—	—
Privacy & Consent Management — securiti	Legal Obligation	1	1	—	—
Product Analytics & Improvement	Legitimate Interests	1	—	—	—
Security & Access Management — 1Password	Legitimate Interests	1	—	—	—
Service Delivery & Processing	Contract	2	—	—	—
Service Delivery & Project Work	Contract	2	—	—	—
Staff Employment Management	Contract	1	—	—	—
Subscription Billing	Contract	2	—	—	—
Survey & Feedback Collection — Qualtrics	Legitimate Interests	1	3	—	—
User Account Provisioning	Contract	1	—	—	—
Website Analytics & Optimization	Legitimate Interests	1	—	—	—
Website/App Analytics — AB Tasty	Legitimate Interests	1	1	—	—
Website/App Analytics — AdTriba	Legitimate Interests	1	4	—	—
Website/App Analytics — Conductrics	Legitimate Interests	1	2	—	—
Website/App Analytics — Google Analytics	Legitimate Interests	1	2	—	—
Website/App Analytics — Optimizely	Legitimate Interests	1	3	—	—
Website/App Analytics — Quantum Metric	Legitimate Interests	1	2	—	—
Website/App Analytics — Rokt	Legitimate Interests	1	3	—	—

SECTION 04

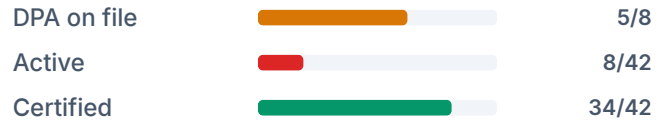
Vendors & Processors

All processors and sub-processors subject to Article 28 obligations. Risk tiering and DPA status are summarised below; the full register follows by category.

CRITICALITY DISTRIBUTION



COVERAGE



PERSONALIZATION & ENGAGEMENT (5)

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
AB Tasty	—	EU	—	—	—
Conductrics	—	US, EU	SOC 2	—	—
Optimizely	—	US, EU, UK	SOC 2 Type II ISO 27001	—	—
Quantum Metric	—	US, EU	SOC 2 ISO 27001 HITRUST PCI DSS	—	—
Rokt	—	US, EU, Australia	SOC 2 SOC 1 ISO 27001	—	—

CUSTOMER DATA PLATFORM (4)

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
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Adobe CDP	—	US, EU, JP	ISO 27001 SOC 2	—	—
mParticle	—	US	SOC 2 Type II	—	—
Salesforce CDP	—	—	—	—	—
Tealium	—	US	ISO 27001 SOC 2	—	—

ADVERTISING (4)

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
Google Ads	—	US, EU	ISO 27001 SOC 2	—	—
Meta Ads	—	US, EU	SOC 2 ISO 27001	—	—
Meta Pixel	—	US, EU	ISO 27001 SOC 2	—	—
Pinterest	—	US	SOC 2	—	—

CLOUD INFRASTRUCTURE (3)

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
Akamai	—	US, EU, JP, AU, SG, DE, UK	ISO 27001 ISO 27017 ISO 27018 ISO 27701	—	—
Cedexis	—	—	—	—	—

Microsoft	—	US, EU, UK, DE, FR, NL, IE, JP, AU, SG, CA, BR, KR	<div style="border: 1px solid #0070C0; padding: 2px; display: inline-block; margin-bottom: 2px;">ISO 27001</div> <div style="border: 1px solid #0070C0; padding: 2px; display: inline-block; margin-bottom: 2px;">ISO 27017</div> <div style="border: 1px solid #0070C0; padding: 2px; display: inline-block; margin-bottom: 2px;">ISO 27018</div> <div style="border: 1px solid #0070C0; padding: 2px; display: inline-block;">ISO 27701</div>	—	—
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LEGAL & COMPLIANCE (2)

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
AccessiWay	—	EU	—	—	—
Adobe Acrobat Sign	—	—	<div style="border: 1px solid #0070C0; padding: 2px; display: inline-block; margin-bottom: 2px;">SOC 2</div> <div style="border: 1px solid #0070C0; padding: 2px; display: inline-block;">ISO 27001</div>	—	—

ANALYTICS & BI (2)

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
AdTriba	—	EU, US, UK, AU	—	—	—
Google Analytics	—	US, EU	<div style="border: 1px solid #0070C0; padding: 2px; display: inline-block; margin-bottom: 2px;">ISO 27001</div> <div style="border: 1px solid #0070C0; padding: 2px; display: inline-block; margin-bottom: 2px;">ISO 27017</div> <div style="border: 1px solid #0070C0; padding: 2px; display: inline-block; margin-bottom: 2px;">ISO 27018</div> <div style="border: 1px solid #0070C0; padding: 2px; display: inline-block;">SOC 2</div>	—	—

DATA_PROCESSING (2)

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
Hightouch	—	US, IE, UK, FR, NL, MT	—	—	—
Tealium	—	US	<div style="border: 1px solid #0070C0; padding: 2px; display: inline-block; margin-bottom: 2px;">ISO 27001</div> <div style="border: 1px solid #0070C0; padding: 2px; display: inline-block;">SOC 2</div>	—	—

CUSTOMER SUPPORT (2)

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
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LivePerson	—	US, EU, UK, AU	<div style="border: 1px solid #0070C0; padding: 2px; display: inline-block; margin-bottom: 2px;">ISO 27001</div> <div style="border: 1px solid #0070C0; padding: 2px; display: inline-block; margin-bottom: 2px;">SOC 2</div> <div style="border: 1px solid #0070C0; padding: 2px; display: inline-block; margin-bottom: 2px;">PCI DSS</div> <div style="border: 1px solid #0070C0; padding: 2px; display: inline-block;">HIPAA</div>	—	—
Zendesk	LOW	US, GB, AU	<div style="border: 1px solid #0070C0; padding: 2px; display: inline-block; margin-bottom: 2px;">ISO 27001</div> <div style="border: 1px solid #0070C0; padding: 2px; display: inline-block; margin-bottom: 2px;">SOC 2 Type II</div> <div style="border: 1px solid #0070C0; padding: 2px; display: inline-block;">ISO 27018</div>	EXPIRED	2026-05-10

PRIVACY & CONSENT ⁽²⁾

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
OneTrust	—	US, EU	<div style="border: 1px solid #0070C0; padding: 2px; display: inline-block; margin-bottom: 2px;">ISO 27001</div> <div style="border: 1px solid #0070C0; padding: 2px; display: inline-block; margin-bottom: 2px;">ISO 27701</div> <div style="border: 1px solid #0070C0; padding: 2px; display: inline-block; margin-bottom: 2px;">ISO 27017</div> <div style="border: 1px solid #0070C0; padding: 2px; display: inline-block;">ISO 9001</div>	—	—
securiti	—	US	<div style="border: 1px solid #0070C0; padding: 2px; display: inline-block; margin-bottom: 2px;">SOC 2</div> <div style="border: 1px solid #0070C0; padding: 2px; display: inline-block; margin-bottom: 2px;">ISO 27001</div> <div style="border: 1px solid #0070C0; padding: 2px; display: inline-block;">ISO 27701</div>	—	—

SECURITY & IDENTITY ⁽¹⁾

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
1Password	—	—	<div style="border: 1px solid #0070C0; padding: 2px; display: inline-block; margin-bottom: 2px;">SOC 2</div> <div style="border: 1px solid #0070C0; padding: 2px; display: inline-block;">ISO 27001</div>	—	—

DESIGN & CREATIVE ⁽¹⁾

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
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Adobe	—	US, EU, AU, JP, SG	<div style="border: 1px solid #ccc; padding: 2px; display: inline-block; margin-bottom: 2px;">ISO 27001</div> <div style="border: 1px solid #ccc; padding: 2px; display: inline-block; margin-bottom: 2px;">SOC 2</div> <div style="border: 1px solid #ccc; padding: 2px; display: inline-block; margin-bottom: 2px;">FedRAMP</div> <div style="border: 1px solid #ccc; padding: 2px; display: inline-block;">HIPAA</div>	—	—
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CONTENT MANAGEMENT ⁽¹⁾

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
Adobe Experience Manager	—	US, EU, AU, JP, SG	<div style="border: 1px solid #ccc; padding: 2px; display: inline-block; margin-bottom: 2px;">ISO 27001</div> <div style="border: 1px solid #ccc; padding: 2px; display: inline-block; margin-bottom: 2px;">SOC 2</div> <div style="border: 1px solid #ccc; padding: 2px; display: inline-block; margin-bottom: 2px;">FedRAMP</div> <div style="border: 1px solid #ccc; padding: 2px; display: inline-block;">HIPAA</div>	—	—

HR MANAGEMENT ⁽¹⁾

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
BambooHR	HIGH	US	<div style="border: 1px solid #ccc; padding: 2px; display: inline-block;">SOC 2 Type II</div>	ACTIVE	2026-06-01

CONSENT MANAGEMENT ⁽¹⁾

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
Cookiebot (Usercentrics)	LOW	DK, DE	<div style="border: 1px solid #ccc; padding: 2px; display: inline-block;">ISO 27001</div>	MISSING	2026-12-01

DEVELOPER TOOLS ⁽¹⁾

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
Dynatrace	—	US, EU, Australia	<div style="border: 1px solid #ccc; padding: 2px; display: inline-block; margin-bottom: 2px;">SOC 1</div> <div style="border: 1px solid #ccc; padding: 2px; display: inline-block; margin-bottom: 2px;">SOC 2</div> <div style="border: 1px solid #ccc; padding: 2px; display: inline-block; margin-bottom: 2px;">ISO 27001</div> <div style="border: 1px solid #ccc; padding: 2px; display: inline-block;">FedRAMP</div>	—	—

CRM ⁽¹⁾

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA
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					NEXT REVIEW
HubSpot	LOW	US, IE, DE	SOC 2 Type II ISO 27001	MISSING	2026-05-20

EMAIL MARKETING (1)

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
Klaviyo	MEDIUM	US	SOC 2 Type II	ACTIVE	2026-04-15

MARKETING AUTOMATION (1)

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
Meet Edgar	—	US	—	—	—

SURVEYS & RESEARCH (1)

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
Qualtrics	—	US, EU, AU	SOC 2 ISO 27001 ISO 27017 ISO 27018	—	—

WAREHOUSE MANAGEMENT (1)

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
SAP	MEDIUM	DE, US, IN	ISO 27001 SOC 2 Type II ISO 27017	—	2026-03-15

ANALYTICS (1)

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
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Seal Metrics — EU, Ireland — —

E-COMMERCE PLATFORM (1)

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
Shopify	MEDIUM	CA, US, IE	SOC 2 Type II PCI DSS Level 1 ISO 27001	ACTIVE	2026-07-15

DATA ANALYTICS (1)

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
Snowflake	MEDIUM	US, EU	ISO 27001 SOC 2 Type II FedRAMP HIPAA	MISSING	2026-02-20

PAYMENT PROCESSING (1)

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
Stripe	HIGH	US, IE, SG	PCI DSS Level 1 SOC 2 Type II ISO 27001	ACTIVE	2026-03-01

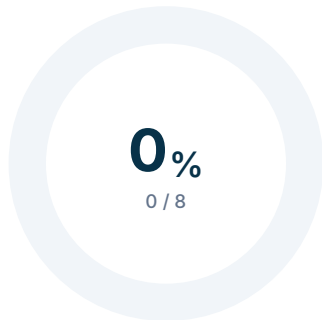
IT SUPPORT (1)

VENDOR	RISK	COUNTRIES	CERTIFICATIONS	DPA	NEXT REVIEW
TechServe Solutions	HIGH	IN	ISO 27001	—	2026-04-01

SECTION 05

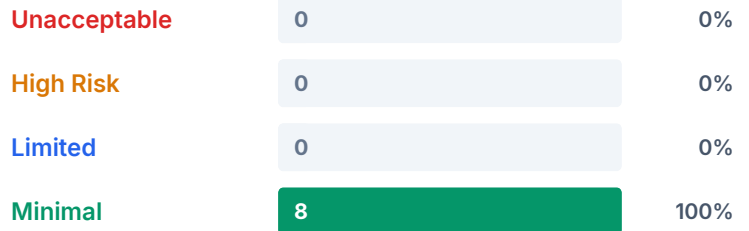
AI Governance

EU AI Act posture across the organisation's registered AI systems. Coverage reflects only systems explicitly catalogued — inferred or shadow AI is out of scope.



EU AI ACT COMPLIANT
0 of 8 systems

RISK DISTRIBUTION



8
AI SYSTEMS REGISTERED

0
HIGH / UNACCEPTABLE RISK

0
ISO 42001 CERTIFIED

ROLE UNDER EU AI ACT



AI SYSTEMS INVENTORY

NAME	CATEGORY	RISK	ROLE	PROVIDER	STATUS
AI System — Adobe Experience Manager	CMS	MINIMAL	—	Adobe Experience Manager	Draft
AI System — Conductrics	A/B Testing	MINIMAL	—	Conductrics	Draft
AI System — Google Ads	Programmatic	MINIMAL	—	Google Ads	Draft
AI System — Google Analytics	Web Analytics	MINIMAL	—	Google Analytics	Draft
AI System — Meta Ads	Social Ads	MINIMAL	—	Meta Ads	Draft
AI System — Optimizely	A/B Testing	MINIMAL	—	Optimizely	Draft
AI System — Pinterest	Social Ads	MINIMAL	—	Pinterest	Draft

AI System — Tealium

CDP

MINIMAL

—

Tealium

Draft

SECTION 06

Data Flow Map

Production assets that participate in at least one data flow or processing activity. Nodes are colour-coded by asset type; dashed edges are auto-generated from activity–asset links, solid edges are explicitly recorded.

Showing 57 of 57 assets.

ASSET TYPES

- Cloud Service
- Application
- Database
- Third Party
- File System

