

# Record of Processing

Article 30 Register

Meridian Retail Group

2026-06-30

CONFIDENTIAL

50

PROCESSING  
ACTIVITIES

28

INT'L TRANSFERS

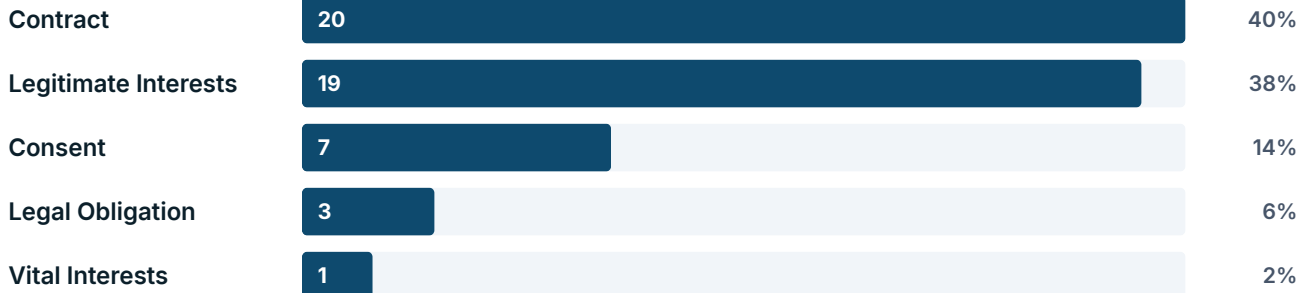
1

AUTOMATED  
DECISIONS

3

NEEDING REVIEW

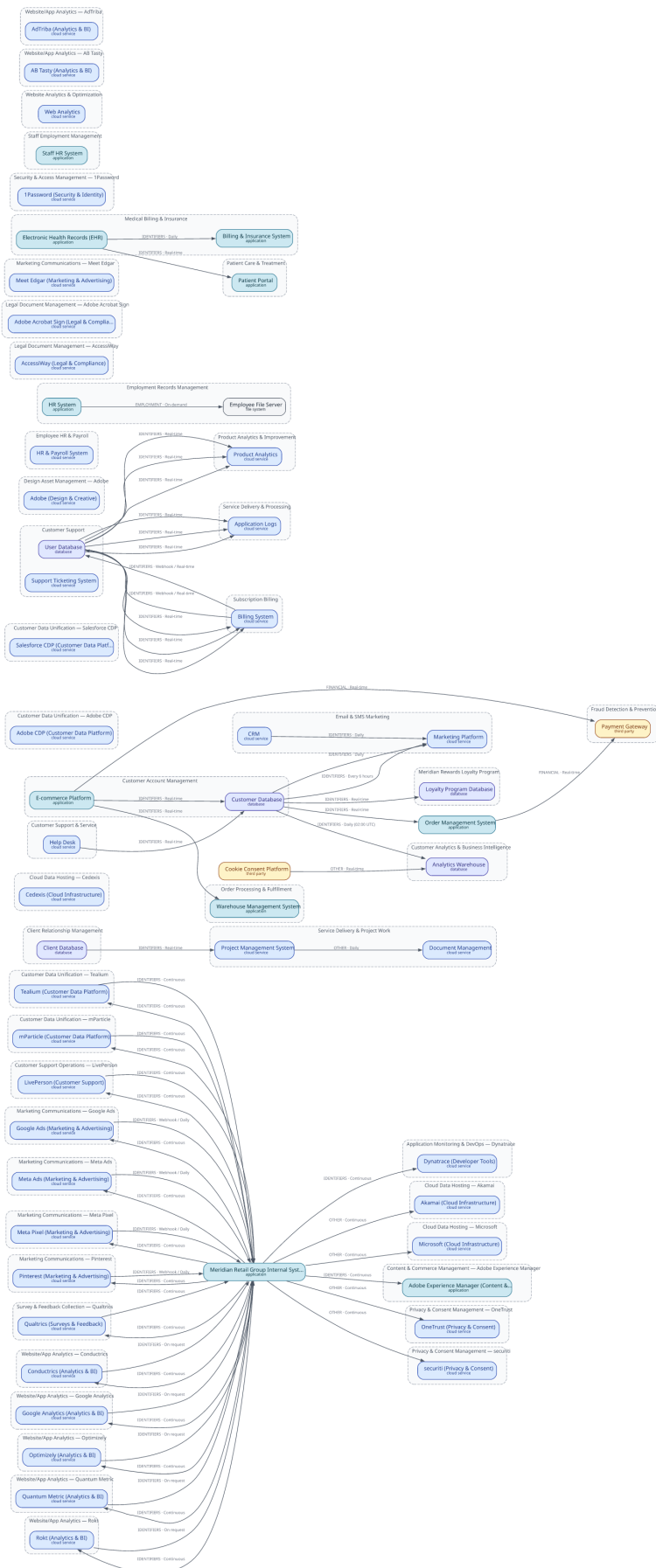
## BY LEGAL BASIS



## Data Flow Map

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Each processing activity is shown as a bordered cluster containing the assets it touches. Dashed edges were auto-generated from activity-asset links; solid edges are explicit.



## Processing Activities

### #01 Application Monitoring & DevOps — Dynatrace

**PURPOSE**

Monitor application health, track errors, manage deployments, and control feature rollouts

**LEGAL BASIS**

Legitimate Interests

**DATA SUBJECTS**

Users, Developers

**DATA CATEGORIES**

Identifiers, Behavioural, Other

**RECIPIENTS**

DevOps tool provider

**RETENTION PERIOD**

90 days for logs, 1 year for metrics

**AUTOMATED DECISIONS**

No

**LAST REVIEWED**

—

**NEXT REVIEW**

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### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Dynatrace (Developer Tools)	Cloud Service	—	Server Logs, Error Stack Traces, User Session Context, IP Addresses

### INTERNATIONAL TRANSFERS

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
US	Dynatrace	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
EU	Dynatrace	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
Australia	Dynatrace	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

Warning: Never reviewed

### #02 Client Relationship Management

**PURPOSE**

Manage client relationships, track engagements, and support business development efforts

**LEGAL BASIS**

Contract

**DATA SUBJECTS**

Clients, Prospects, Business contacts

**DATA CATEGORIES**

Identifiers, Employment, Behavioural

**RECIPIENTS**

**RETENTION PERIOD**

CRM provider, Internal teams

Duration of relationship + 5 years

AUTOMATED DECISIONS

LAST REVIEWED

No

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NEXT REVIEW

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### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Client Database	Database	—	Client Contact Name, Email & Phone, Company & Role, Engagement History

Warning: Never reviewed

### #03 Cloud Data Hosting — Akamai

PURPOSE

Host and store application data including personal data in cloud infrastructure with appropriate security controls

LEGAL BASIS

Contract

DATA SUBJECTS

Customers, Employees, All data subjects

DATA CATEGORIES

Identifiers, Other

RECIPIENTS

Cloud infrastructure provider

RETENTION PERIOD

As defined by data controller policies

AUTOMATED DECISIONS

No

LAST REVIEWED

—

NEXT REVIEW

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### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Akamai (Cloud Infrastructure)	Cloud Service	—	Application Data, Server Logs, Stored Customer Records, Backup Data

### INTERNATIONAL TRANSFERS

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
US	Akamai	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
EU	Akamai	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

AU	Akamai	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
SG	Akamai	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
UK	Akamai	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

Warning: Never reviewed

### #04 Cloud Data Hosting — Cedexis

**PURPOSE**

Host and store application data including personal data in cloud infrastructure with appropriate security controls

**LEGAL BASIS**

Contract

**DATA SUBJECTS**

Customers, Employees, All data subjects

**DATA CATEGORIES**

Identifiers, Other

**RECIPIENTS**

Cloud infrastructure provider

**RETENTION PERIOD**

As defined by data controller policies

**AUTOMATED DECISIONS**

No

**LAST REVIEWED**

—

**NEXT REVIEW**

—

### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Cedexis (Cloud Infrastructure)	Cloud Service	—	Application Data, Server Logs, Stored Customer Records, Backup Data

Warning: Never reviewed

### #05 Cloud Data Hosting — Microsoft

**PURPOSE**

Host and store application data including personal data in cloud infrastructure with appropriate security controls

**LEGAL BASIS**

Contract

**DATA SUBJECTS**

Customers, Employees, All data subjects

**DATA CATEGORIES**

Identifiers, Other

RECIPIENTS

Cloud infrastructure provider

RETENTION PERIOD

As defined by data controller policies

AUTOMATED DECISIONS

No

LAST REVIEWED

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NEXT REVIEW

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## SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Microsoft (Cloud Infrastructure)	Cloud Service	—	Application Data, Server Logs, Stored Customer Records, Backup Data

## INTERNATIONAL TRANSFERS

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
US	Microsoft	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
EU	Microsoft	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
UK	Microsoft	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
AU	Microsoft	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
SG	Microsoft	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
BR	Microsoft	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

Warning: Never reviewed

## #06 Content & Commerce Management — Adobe Experience Manager

PURPOSE

Manage web content, user accounts, and ecommerce transactions

LEGAL BASIS

Contract

DATA SUBJECTS

Customers, Registered users

DATA CATEGORIES

Identifiers, Financial, Behavioural

RECIPIENTS

Platform provider, Payment processor

RETENTION PERIOD

Duration of account + 5 years for transactions

AUTOMATED DECISIONS

No

LAST REVIEWED

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NEXT REVIEW

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### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Adobe Experience Manager (Content & E-commerce)	Application	—	User Accounts, Order/Purchase Data, Shipping Address, Content Interactions

### INTERNATIONAL TRANSFERS

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
US	Adobe Experience Manager	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
EU	Adobe Experience Manager	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
AU	Adobe Experience Manager	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
SG	Adobe Experience Manager	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

Warning: Never reviewed

## #07 Customer Account Management

**PURPOSE**

To manage customer accounts, enable login/authentication, and maintain customer preferences.

**LEGAL BASIS**

Contract — Processing is necessary for the performance of the service agreement with the customer.

**DATA SUBJECTS**

Customers

**DATA CATEGORIES**

Identifiers, Behavioural

**RECIPIENTS**

Customer service team

**RETENTION PERIOD**

Duration of account + 2 years

**AUTOMATED DECISIONS**

No

**LAST REVIEWED**

2025-10-01

**NEXT REVIEW**

2026-10-01

**SYSTEMS / ASSETS**

SYSTEM	TYPE	LOCATION	ELEMENTS
Customer Database	Database	AWS eu-west-1 (Ireland)	Customer Full Name, Customer Email Address, Customer Phone Number, Shipping Address, Purchase History
E-commerce Platform	Application	Shopify Cloud (EU)	Account Credentials, Session Data, Browsing & Click History

#08 **Customer Analytics & Business Intelligence**

**PURPOSE**

To understand customer needs, improve product offerings, and optimize business operations through data-driven insights.

**LEGAL BASIS**

Legitimate Interests — Meridian has a legitimate interest in understanding customer behavior to improve services. A Legitimate Interest Assessment has been completed.

**DATA SUBJECTS**

Customers, Website visitors

**DATA CATEGORIES**

Behavioural, Demographics

**RECIPIENTS**

Data analytics team, Product team

**RETENTION PERIOD**

2 years (aggregated data retained longer)

**AUTOMATED DECISIONS**

No

**LAST REVIEWED**

2025-11-01

**NEXT REVIEW**

2026-05-01

**SYSTEMS / ASSETS**

SYSTEM	TYPE	LOCATION	ELEMENTS
Analytics Warehouse	Database	Snowflake AWS eu-west-1	User Behavior Events, Aggregated Demographics

Customer Database	Database	AWS eu-west-1 (Ireland)	Customer Full Name, Customer Email Address, Customer Phone Number, Shipping Address, Purchase History
E-commerce Platform	Application	Shopify Cloud (EU)	Account Credentials, Session Data, Browsing & Click History

### INTERNATIONAL TRANSFERS

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
US	Snowflake Inc.	STANDARD_CONTRACTUAL_CLAUSES	EU SCCs (Module 2: Controller to Processor), supplementary encryption measures, annual TIA review.

### #09 Customer Data Unification — Adobe CDP

PURPOSE

Create unified customer profiles by combining data from multiple sources for personalization and analytics

LEGAL BASIS

Legitimate Interests

DATA SUBJECTS

Customers, Website visitors

DATA CATEGORIES

Identifiers, Behavioural, Financial

RECIPIENTS

CDP provider, Connected marketing tools

RETENTION PERIOD

Duration of customer relationship + 1 year

AUTOMATED DECISIONS

No

LAST REVIEWED

—

NEXT REVIEW

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### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Adobe CDP (Customer Data Platform)	Cloud Service	—	Unified Customer Profile, Cross-device Identifiers, Behavioral Segments, Transaction History, Consent Records

## INTERNATIONAL TRANSFERS

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
US	Adobe CDP	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
EU	Adobe CDP	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

Warning: Never reviewed

### #10 Customer Data Unification — Salesforce CDP

<b>PURPOSE</b> Create unified customer profiles by combining data from multiple sources for personalization and analytics	<b>LEGAL BASIS</b> Legitimate Interests
<b>DATA SUBJECTS</b> Customers, Website visitors	<b>DATA CATEGORIES</b> Identifiers, Behavioural, Financial
<b>RECIPIENTS</b> CDP provider, Connected marketing tools	<b>RETENTION PERIOD</b> Duration of customer relationship + 1 year
<b>AUTOMATED DECISIONS</b> No	<b>LAST REVIEWED</b> —
<b>NEXT REVIEW</b> —	

## SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Salesforce CDP (Customer Data Platform)	Cloud Service	—	Unified Customer Profile, Cross-device Identifiers, Behavioral Segments, Transaction History, Consent Records

Warning: Never reviewed

### #11 Customer Data Unification — Tealium

<b>PURPOSE</b> Create unified customer profiles by combining data from multiple sources for personalization and analytics	<b>LEGAL BASIS</b> Legitimate Interests
<b>DATA SUBJECTS</b> Customers, Website visitors	<b>DATA CATEGORIES</b> Identifiers, Behavioural, Financial
<b>RECIPIENTS</b> CDP provider, Connected marketing tools	<b>RETENTION PERIOD</b> Duration of customer relationship + 1 year
<b>AUTOMATED DECISIONS</b>	<b>LAST REVIEWED</b>

No —

NEXT REVIEW

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### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Tealium (Customer Data Platform)	Cloud Service	—	Unified Customer Profile, Cross-device Identifiers, Behavioral Segments, Transaction History, Consent Records

### INTERNATIONAL TRANSFERS

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
US	Tealium	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

Warning: Never reviewed

## #12 Customer Data Unification — mParticle

**PURPOSE**

Create unified customer profiles by combining data from multiple sources for personalization and analytics

**LEGAL BASIS**

Legitimate Interests

**DATA SUBJECTS**

Customers, Website visitors

**DATA CATEGORIES**

Identifiers, Behavioural, Financial

**RECIPIENTS**

CDP provider, Connected marketing tools

**RETENTION PERIOD**

Duration of customer relationship + 1 year

**AUTOMATED DECISIONS**

No

**LAST REVIEWED**

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NEXT REVIEW

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### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
mParticle (Customer Data Platform)	Cloud Service	—	Unified Customer Profile, Cross-device Identifiers, Behavioral Segments, Transaction History, Consent Records

### INTERNATIONAL TRANSFERS

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
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US	mParticle	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
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Warning: Never reviewed

### #13 Customer Support

<b>PURPOSE</b> Provide customer support, troubleshoot issues, and maintain service quality	<b>LEGAL BASIS</b> Contract
<b>DATA SUBJECTS</b> Customers, End users	<b>DATA CATEGORIES</b> Identifiers, Other
<b>RECIPIENTS</b> Support platform provider	<b>RETENTION PERIOD</b> 3 years after ticket closure
<b>AUTOMATED DECISIONS</b> No	<b>LAST REVIEWED</b> —
<b>NEXT REVIEW</b> —	

### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Support Ticketing System	Cloud Service	—	Contact Name & Email, Ticket Content, Screenshots/Attachments
User Database	Database	—	Full Name, Email Address, Password Hash, Profile Avatar, Organization/Workspace Data

Warning: Never reviewed

### #14 Customer Support & Service

<b>PURPOSE</b> To provide customer support, resolve issues, and process returns and refunds.	<b>LEGAL BASIS</b> Contract — Processing is necessary to fulfill our contractual obligations to provide after-sale support.
<b>DATA SUBJECTS</b> Customers	<b>DATA CATEGORIES</b> Identifiers, Other
<b>RECIPIENTS</b> Customer support team, Zendesk (helpdesk platform)	<b>RETENTION PERIOD</b> 3 years from ticket closure
<b>AUTOMATED DECISIONS</b> No	<b>LAST REVIEWED</b> 2025-12-01
<b>NEXT REVIEW</b> 2026-12-01	

**SYSTEMS / ASSETS**

SYSTEM	TYPE	LOCATION	ELEMENTS
Help Desk	Cloud Service	Zendesk Cloud (UK)	Support Ticket Content, Customer Contact Info
Customer Database	Database	AWS eu-west-1 (Ireland)	Customer Full Name, Customer Email Address, Customer Phone Number, Shipping Address, Purchase History

**INTERNATIONAL TRANSFERS**

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
GB	Zendesk Inc.	ADEQUACY_DECISION	UK adequacy decision (June 2021), Zendesk UK data residency.

**#15 Customer Support Operations — LivePerson****PURPOSE**

Handle customer inquiries, track support tickets, and maintain communication records for service quality

**LEGAL BASIS**

Contract

**DATA SUBJECTS**

Customers, Support requesters

**DATA CATEGORIES**

Identifiers, Other

**RECIPIENTS**

Support platform provider

**RETENTION PERIOD**

3 years after ticket closure

**AUTOMATED DECISIONS**

No

**LAST REVIEWED**

—

**NEXT REVIEW**

—

**SYSTEMS / ASSETS**

SYSTEM	TYPE	LOCATION	ELEMENTS
LivePerson (Customer Support)	Cloud Service	—	Full Name, Email Address, Phone Number, Support Ticket Content, Call Recordings

**INTERNATIONAL TRANSFERS**

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
US	LivePerson	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

EU	LivePerson	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
UK	LivePerson	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
AU	LivePerson	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

Warning: Never reviewed

## #16 Design Asset Management — Adobe

<b>PURPOSE</b> Create, manage, and collaborate on visual content and brand assets	<b>LEGAL BASIS</b> Legitimate Interests
<b>DATA SUBJECTS</b> Employees, Designers, External collaborators	<b>DATA CATEGORIES</b> Identifiers, Behavioural
<b>RECIPIENTS</b> Design platform provider	<b>RETENTION PERIOD</b> Duration of account
<b>AUTOMATED DECISIONS</b> No	<b>LAST REVIEWED</b> —
<b>NEXT REVIEW</b> —	

### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Adobe (Design & Creative)	Cloud Service	—	User Accounts, Creative Assets, Collaboration Data

### INTERNATIONAL TRANSFERS

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
US	Adobe	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
EU	Adobe	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
AU	Adobe	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

SG	Adobe	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
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Warning: Never reviewed

### #17 Email & SMS Marketing

**PURPOSE**

To promote products and services to customers who have opted in to marketing communications.

**LEGAL BASIS**

Consent — Customers explicitly opt-in to marketing communications via checkbox during registration and can unsubscribe at any time.

**DATA SUBJECTS**

Customers, Newsletter subscribers

**DATA CATEGORIES**

Identifiers, Behavioural

**RECIPIENTS**

Marketing team, Klaviyo (email/SMS provider)

**RETENTION PERIOD**

Until consent withdrawn + 30 days

**AUTOMATED DECISIONS**

No

**LAST REVIEWED**

2025-08-20

**NEXT REVIEW**

2026-08-20

### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Marketing Platform	Cloud Service	Klaviyo Cloud (US)	Email & SMS Preferences, Campaign Interaction History
CRM	Cloud Service	HubSpot Cloud (EU)	B2B Contact Information, Sales Notes & Correspondence
Customer Database	Database	AWS eu-west-1 (Ireland)	Customer Full Name, Customer Email Address, Customer Phone Number, Shipping Address, Purchase History

### #18 Employee HR & Payroll

**PURPOSE**

Manage employment lifecycle, process payroll, and fulfill employment obligations

**LEGAL BASIS**

Contract

**DATA SUBJECTS**

Employees, Contractors

**DATA CATEGORIES**

Identifiers, Financial, Employment

**RECIPIENTS**

Payroll provider, Tax authorities, Benefits providers

**RETENTION PERIOD**

Duration of employment + 7 years

**AUTOMATED DECISIONS**

No

**LAST REVIEWED**

—

NEXT REVIEW

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### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
HR & Payroll System	Cloud Service	—	Employee Personal Details, Salary & Compensation, Bank Account Details, Tax Information, Emergency Contacts

Warning: Never reviewed

### #19 Employment Records Management

**PURPOSE**

To manage the employment relationship, fulfill legal obligations, and administer employee benefits and compensation.

**DATA SUBJECTS**

Employees, Job applicants, Former employees

**RECIPIENTS**

HR team, Payroll provider, Tax authorities

**AUTOMATED DECISIONS**

No

**NEXT REVIEW**

2026-06-01

**LEGAL BASIS**

Contract — Processing is necessary for the performance of employment contracts and to comply with Dutch/EU employment law.

**DATA CATEGORIES**

Identifiers, Financial, Employment

**RETENTION PERIOD**

10 years after employment ends

**LAST REVIEWED**

2025-06-01

### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
HR System	Application	BambooHR Cloud (US)	National ID / BSN, Salary & Compensation, Employment History
Employee File Server	File System	Azure West Europe	Employee Contracts, Performance Reviews

### #20 Fraud Detection & Prevention

**PURPOSE**

To detect and prevent fraudulent transactions, protecting both the company and customers from financial crime.

**DATA SUBJECTS**

Customers, Website visitors

**RECIPIENTS**

**LEGAL BASIS**

Legitimate Interests — Meridian has a legitimate interest in preventing fraud. This is also supported by PSD2 requirements for strong customer authentication.

**DATA CATEGORIES**

Identifiers, Financial, Behavioural

**RETENTION PERIOD**

Risk/fraud team, Stripe (fraud screening)

5 years (regulatory requirement)

**AUTOMATED DECISIONS**

Yes — Automated fraud scoring may result in transaction blocks. Manual review process available for flagged transactions.

**LAST REVIEWED**

2025-11-15

**NEXT REVIEW**

2026-05-15

**SYSTEMS / ASSETS**

SYSTEM	TYPE	LOCATION	ELEMENTS
Payment Gateway	Third Party	Stripe EU (Ireland)	Payment Card Number (tokenized), Billing Address
Customer Database	Database	AWS eu-west-1 (Ireland)	Customer Full Name, Customer Email Address, Customer Phone Number, Shipping Address, Purchase History
Analytics Warehouse	Database	Snowflake AWS eu-west-1	User Behavior Events, Aggregated Demographics

#21 **Legal Document Management — AccessiWay**

**PURPOSE**

Manage contracts, collect digital signatures, and ensure regulatory compliance

**LEGAL BASIS**

Contract

**DATA SUBJECTS**

Customers, Employees, Business partners

**DATA CATEGORIES**

Identifiers, Behavioural, Other

**RECIPIENTS**

Legal tech provider

**RETENTION PERIOD**

10 years (legal retention)

**AUTOMATED DECISIONS**

No

**LAST REVIEWED**

—

**NEXT REVIEW**

—

**SYSTEMS / ASSETS**

SYSTEM	TYPE	LOCATION	ELEMENTS
AccessiWay (Legal & Compliance)	Cloud Service	—	Signatory Name & Email, Contract/Document Content, Digital Signatures, Audit Trail

**INTERNATIONAL TRANSFERS**

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
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EU	AccessiWay	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
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Warning: Never reviewed

## #22 Legal Document Management — Adobe Acrobat Sign

<b>PURPOSE</b> Manage contracts, collect digital signatures, and ensure regulatory compliance	<b>LEGAL BASIS</b> Contract
<b>DATA SUBJECTS</b> Customers, Employees, Business partners	<b>DATA CATEGORIES</b> Identifiers, Behavioural, Other
<b>RECIPIENTS</b> Legal tech provider	<b>RETENTION PERIOD</b> 10 years (legal retention)
<b>AUTOMATED DECISIONS</b> No	<b>LAST REVIEWED</b> —
<b>NEXT REVIEW</b> —	

### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Adobe Acrobat Sign (Legal & Compliance)	Cloud Service	—	Signatory Name & Email, Contract/Document Content, Digital Signatures, Audit Trail

Warning: Never reviewed

## #23 Marketing & Promotions

<b>PURPOSE</b> Send marketing communications and personalized product recommendations to opted-in customers	<b>LEGAL BASIS</b> Consent
<b>DATA SUBJECTS</b> Customers, Subscribers	<b>DATA CATEGORIES</b> Identifiers, Behavioural
<b>RECIPIENTS</b> Email marketing provider	<b>RETENTION PERIOD</b> Until consent withdrawn
<b>AUTOMATED DECISIONS</b> No	<b>LAST REVIEWED</b> —
<b>NEXT REVIEW</b> —	

### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
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Marketing Platform	Cloud Service	Klaviyo Cloud (US)	Email & SMS Preferences, Campaign Interaction History
Customer Database	Database	AWS eu-west-1 (Ireland)	Customer Full Name, Customer Email Address, Customer Phone Number, Shipping Address, Purchase History

Warning: Never reviewed

## #24 Marketing Communications — Google Ads

**PURPOSE**

Send targeted marketing communications, track campaign effectiveness, and manage subscriber preferences

**LEGAL BASIS**

Consent

**DATA SUBJECTS**

Subscribers, Leads, Customers

**DATA CATEGORIES**

Identifiers, Behavioural, Employment

**RECIPIENTS**

Marketing platform provider, Email service provider

**RETENTION PERIOD**

Until consent withdrawn + 30 days

**AUTOMATED DECISIONS**

No

**LAST REVIEWED**

—

**NEXT REVIEW**

—

## SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Google Ads (Marketing & Advertising)	Cloud Service	—	Email Address, Full Name, Company Name, Marketing Preferences, Campaign Interactions, Cookie Identifiers

## INTERNATIONAL TRANSFERS

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
US	Google Ads	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
EU	Google Ads	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

Warning: Never reviewed

## #25 Marketing Communications — Meet Edgar

**PURPOSE**

**LEGAL BASIS**

Send targeted marketing communications, track campaign effectiveness, and manage subscriber preferences

Consent

DATA SUBJECTS

Subscribers, Leads, Customers

DATA CATEGORIES

Identifiers, Behavioural, Employment

RECIPIENTS

Marketing platform provider, Email service provider

RETENTION PERIOD

Until consent withdrawn + 30 days

AUTOMATED DECISIONS

No

LAST REVIEWED

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NEXT REVIEW

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### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Meet Edgar (Marketing & Advertising)	Cloud Service	—	Email Address, Full Name, Company Name, Marketing Preferences, Campaign Interactions, Cookie Identifiers

### INTERNATIONAL TRANSFERS

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
US	Meet Edgar	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

Warning: Never reviewed

## #26 Marketing Communications — Meta Ads

PURPOSE

Send targeted marketing communications, track campaign effectiveness, and manage subscriber preferences

LEGAL BASIS

Consent

DATA SUBJECTS

Subscribers, Leads, Customers

DATA CATEGORIES

Identifiers, Behavioural, Employment

RECIPIENTS

Marketing platform provider, Email service provider

RETENTION PERIOD

Until consent withdrawn + 30 days

AUTOMATED DECISIONS

No

LAST REVIEWED

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NEXT REVIEW

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### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
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Meta Ads (Marketing & Advertising)	Cloud Service	—	Email Address, Full Name, Company Name, Marketing Preferences, Campaign Interactions, Cookie Identifiers
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**INTERNATIONAL TRANSFERS**

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
US	Meta Ads	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
EU	Meta Ads	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

Warning: Never reviewed

#27 **Marketing Communications — Meta Pixel**

PURPOSE

Send targeted marketing communications, track campaign effectiveness, and manage subscriber preferences

LEGAL BASIS

Consent

DATA SUBJECTS

Subscribers, Leads, Customers

DATA CATEGORIES

Identifiers, Behavioural, Employment

RECIPIENTS

Marketing platform provider, Email service provider

RETENTION PERIOD

Until consent withdrawn + 30 days

AUTOMATED DECISIONS

No

LAST REVIEWED

—

NEXT REVIEW

—

**SYSTEMS / ASSETS**

SYSTEM	TYPE	LOCATION	ELEMENTS
Meta Pixel (Marketing & Advertising)	Cloud Service	—	Email Address, Full Name, Company Name, Marketing Preferences, Campaign Interactions, Cookie Identifiers

**INTERNATIONAL TRANSFERS**

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
US	Meta Pixel	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

EU	Meta Pixel	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
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Warning: Never reviewed

## #28 Marketing Communications — Pinterest

<b>PURPOSE</b> Send targeted marketing communications, track campaign effectiveness, and manage subscriber preferences	<b>LEGAL BASIS</b> Consent
<b>DATA SUBJECTS</b> Subscribers, Leads, Customers	<b>DATA CATEGORIES</b> Identifiers, Behavioural, Employment
<b>RECIPIENTS</b> Marketing platform provider, Email service provider	<b>RETENTION PERIOD</b> Until consent withdrawn + 30 days
<b>AUTOMATED DECISIONS</b> No	<b>LAST REVIEWED</b> —
<b>NEXT REVIEW</b> —	

## SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Pinterest (Marketing & Advertising)	Cloud Service	—	Email Address, Full Name, Company Name, Marketing Preferences, Campaign Interactions, Cookie Identifiers

## INTERNATIONAL TRANSFERS

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
US	Pinterest	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

Warning: Never reviewed

## #29 Medical Billing & Insurance

<b>PURPOSE</b> Process insurance claims and patient billing for healthcare services rendered	<b>LEGAL BASIS</b> Legal Obligation
<b>DATA SUBJECTS</b> Patients, Insurance holders	<b>DATA CATEGORIES</b> Identifiers, Financial, Health
<b>RECIPIENTS</b>	<b>RETENTION PERIOD</b>

Insurance companies, Billing clearinghouse

7 years (financial records)

AUTOMATED DECISIONS

No

LAST REVIEWED

—

NEXT REVIEW

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## SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Billing & Insurance System	Application	—	Insurance Policy Number, Billing Codes (ICD/CPT), Payment Records, Patient Address
Electronic Health Records (EHR)	Application	—	Patient Name, Date of Birth, National ID / Insurance Number, Medical Diagnoses, Treatment Records, Prescription Data, Lab Results

Warning: Never reviewed

### #30 Meridian Rewards Loyalty Program

PURPOSE

To operate the Meridian Rewards loyalty program and provide personalized member benefits.

LEGAL BASIS

Contract — Processing is necessary for the performance of the loyalty program terms accepted by the member.

DATA SUBJECTS

Loyalty program members

DATA CATEGORIES

Identifiers, Behavioural

RECIPIENTS

Marketing team, Customer service team

RETENTION PERIOD

Duration of membership + 5 years

AUTOMATED DECISIONS

No

LAST REVIEWED

2025-07-10

NEXT REVIEW

2026-07-10

## SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Loyalty Program Database	Database	AWS eu-west-1 (Ireland)	Loyalty Points Balance, Reward Preferences
Customer Database	Database	AWS eu-west-1 (Ireland)	Customer Full Name, Customer Email Address, Customer Phone Number, Shipping Address, Purchase History

### #31 Order Processing & Fulfillment

**PURPOSE**

To fulfill purchase agreements with customers, process payments, and deliver ordered goods.

**LEGAL BASIS**

Contract — Processing is necessary for the performance of the sales contract with the customer.

**DATA SUBJECTS**

Customers

**DATA CATEGORIES**

Identifiers, Financial, Location

**RECIPIENTS**

Fulfillment team, Payment processor (Stripe), Shipping carriers

**RETENTION PERIOD**

7 years (tax/accounting requirements)

**AUTOMATED DECISIONS**

No

**LAST REVIEWED**

2025-09-15

**NEXT REVIEW**

2026-09-15

**SYSTEMS / ASSETS**

SYSTEM	TYPE	LOCATION	ELEMENTS
Customer Database	Database	AWS eu-west-1 (Ireland)	Customer Full Name, Customer Email Address, Customer Phone Number, Shipping Address, Purchase History
E-commerce Platform	Application	Shopify Cloud (EU)	Account Credentials, Session Data, Browsing & Click History
Payment Gateway	Third Party	Stripe EU (Ireland)	Payment Card Number (tokenized), Billing Address
Warehouse Management System	Application	SAP Cloud (EU)	Delivery Address

**INTERNATIONAL TRANSFERS**

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
US	Stripe Inc.	STANDARD_CONTRACTUAL_CLAUSES	EU SCCs (Module 2), PCI DSS Level 1 compliance, tokenization of card data.

**#32 Patient Care & Treatment**

**PURPOSE**

Provide healthcare services, record diagnoses and treatments, and maintain continuity of care

**LEGAL BASIS**

Vital Interests

**DATA SUBJECTS**

Patients

**DATA CATEGORIES**

Identifiers, Health, Demographics

**RECIPIENTS**

Healthcare providers, Referring specialists

**RETENTION PERIOD**

10 years after last treatment (or as per law)

AUTOMATED DECISIONS

No

LAST REVIEWED

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NEXT REVIEW

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**SYSTEMS / ASSETS**

SYSTEM	TYPE	LOCATION	ELEMENTS
Electronic Health Records (EHR)	Application	—	Patient Name, Date of Birth, National ID / Insurance Number, Medical Diagnoses, Treatment Records, Prescription Data, Lab Results
Patient Portal	Application	—	Login Credentials, Contact Information, Appointment History, Messages to Providers

Warning: Never reviewed

#33 **Privacy & Consent Management — OneTrust**

PURPOSE

Collect and manage user consent preferences, handle cookie compliance, and support data governance processes

LEGAL BASIS

Legal Obligation

DATA SUBJECTS

Website visitors, Customers, Data subjects

DATA CATEGORIES

Identifiers, Behavioural, Other

RECIPIENTS

Consent management provider

RETENTION PERIOD

5 years (proof of consent)

AUTOMATED DECISIONS

No

LAST REVIEWED

—

NEXT REVIEW

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**SYSTEMS / ASSETS**

SYSTEM	TYPE	LOCATION	ELEMENTS
OneTrust (Privacy & Consent)	Cloud Service	—	Consent Records, Cookie Preferences, User Identifiers, Data Subject Requests

### INTERNATIONAL TRANSFERS

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
US	OneTrust	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
EU	OneTrust	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

Warning: Never reviewed

### #34 Privacy & Consent Management — securiti

<b>PURPOSE</b> Collect and manage user consent preferences, handle cookie compliance, and support data governance processes	<b>LEGAL BASIS</b> Legal Obligation
<b>DATA SUBJECTS</b> Website visitors, Customers, Data subjects	<b>DATA CATEGORIES</b> Identifiers, Behavioural, Other
<b>RECIPIENTS</b> Consent management provider	<b>RETENTION PERIOD</b> 5 years (proof of consent)
<b>AUTOMATED DECISIONS</b> No	<b>LAST REVIEWED</b> —
<b>NEXT REVIEW</b> —	

### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
securiti (Privacy & Consent)	Cloud Service	—	Consent Records, Cookie Preferences, User Identifiers, Data Subject Requests

### INTERNATIONAL TRANSFERS

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
US	securiti	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

Warning: Never reviewed

### #35 Product Analytics & Improvement

<b>PURPOSE</b>	<b>LEGAL BASIS</b>
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Analyze product usage patterns to improve features, fix usability issues, and guide product roadmap

Legitimate Interests

DATA SUBJECTS

End users

DATA CATEGORIES

Identifiers, Behavioural

RECIPIENTS

Analytics provider

RETENTION PERIOD

26 months

AUTOMATED DECISIONS

No

LAST REVIEWED

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NEXT REVIEW

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### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Product Analytics	Cloud Service	—	User ID, Feature Usage Events, Session Data

Warning: Never reviewed

### #36 Security & Access Management — 1Password

PURPOSE

Authenticate users, manage access control, detect security threats, and maintain audit trails

LEGAL BASIS

Legitimate Interests

DATA SUBJECTS

Employees, Users, System administrators

DATA CATEGORIES

Identifiers, Behavioural, Other

RECIPIENTS

Security platform provider

RETENTION PERIOD

1 year for access logs, 2 years for security events

AUTOMATED DECISIONS

No

LAST REVIEWED

—

NEXT REVIEW

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### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
1Password (Security & Identity)	Cloud Service	—	User Credentials (hashed), Access Logs, IP Addresses, Device Identifiers, Security Events

Warning: Never reviewed

### #37 Service Delivery & Processing

PURPOSE

LEGAL BASIS

Contract

Deliver the contracted SaaS service by processing user data within the application

DATA SUBJECTS

End users

DATA CATEGORIES

Identifiers, Behavioural, Other

RECIPIENTS

Sub-processors (cloud infrastructure)

RETENTION PERIOD

Duration of subscription + 30 days for deletion

AUTOMATED DECISIONS

No

LAST REVIEWED

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NEXT REVIEW

—

**SYSTEMS / ASSETS**

SYSTEM	TYPE	LOCATION	ELEMENTS
User Database	Database	—	Full Name, Email Address, Password Hash, Profile Avatar, Organization/Workspace Data
Application Logs	Cloud Service	—	IP Address, User Actions, Error Traces, Session Identifiers

Warning: Never reviewed

#38 **Service Delivery & Project Work**

PURPOSE

Deliver contracted professional services, manage project workflows, and maintain engagement records

LEGAL BASIS

Contract

DATA SUBJECTS

Clients, Client employees

DATA CATEGORIES

Identifiers, Other

RECIPIENTS

Project management platform, Subcontractors (where applicable)

RETENTION PERIOD

Duration of engagement + 7 years

AUTOMATED DECISIONS

No

LAST REVIEWED

—

NEXT REVIEW

—

**SYSTEMS / ASSETS**

SYSTEM	TYPE	LOCATION	ELEMENTS
Project Management System	Cloud Service	—	Project Documents, Client Communications, Time Tracking, Deliverable Files
Document Management	Cloud Service	—	Client Contracts, NDAs & Legal Docs, Financial Reports

Warning: Never reviewed

### #39 Staff Employment Management

**PURPOSE**

Manage healthcare staff employment, verify professional credentials, and ensure regulatory compliance

**LEGAL BASIS**

Contract

**DATA SUBJECTS**

Employees, Clinical staff

**DATA CATEGORIES**

Identifiers, Employment, Financial, Criminal

**RECIPIENTS**

HR platform provider, Regulatory bodies

**RETENTION PERIOD**

Duration of employment + 6 years

**AUTOMATED DECISIONS**

No

**LAST REVIEWED**

—

**NEXT REVIEW**

—

#### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Staff HR System	Application	—	Employee Name & Contact, Professional Licenses, Payroll Data, Background Check Results

Warning: Never reviewed

### #40 Subscription Billing

**PURPOSE**

Process subscription payments, generate invoices, and manage billing lifecycle

**LEGAL BASIS**

Contract

**DATA SUBJECTS**

Billing contacts, Account administrators

**DATA CATEGORIES**

Identifiers, Financial

**RECIPIENTS**

Payment processor, Tax authorities

**RETENTION PERIOD**

7 years (tax/accounting)

**AUTOMATED DECISIONS**

No

**LAST REVIEWED**

—

**NEXT REVIEW**

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#### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Billing System	Cloud Service	—	Billing Contact, Payment Method, Invoice History, Subscription Plan

User Database	Database	—	Full Name, Email Address, Password Hash, Profile Avatar, Organization/Workspace Data
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Warning: Never reviewed

### #41 Survey & Feedback Collection — Qualtrics

<b>PURPOSE</b> Collect user feedback through surveys to measure satisfaction and improve products/services	<b>LEGAL BASIS</b> Legitimate Interests
<b>DATA SUBJECTS</b> Customers, Users, Employees	<b>DATA CATEGORIES</b> Identifiers, Behavioural
<b>RECIPIENTS</b> Survey platform provider	<b>RETENTION PERIOD</b> 2 years
<b>AUTOMATED DECISIONS</b> No	<b>LAST REVIEWED</b> —
<b>NEXT REVIEW</b> —	

### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Qualtrics (Surveys & Feedback)	Cloud Service	—	Respondent Email, Survey Responses, NPS/Satisfaction Scores, Free-text Comments

### INTERNATIONAL TRANSFERS

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
US	Qualtrics	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
EU	Qualtrics	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
AU	Qualtrics	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

Warning: Never reviewed

### #42 User Account Provisioning

<b>PURPOSE</b> Create and manage user accounts, handle authentication, and provision workspace resources
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LEGAL BASIS

Contract

DATA SUBJECTS

Customers, End users

DATA CATEGORIES

Identifiers, Employment

RECIPIENTS

Internal teams

RETENTION PERIOD

Duration of subscription + 90 days

AUTOMATED DECISIONS

No

LAST REVIEWED

—

NEXT REVIEW

—

**SYSTEMS / ASSETS**

SYSTEM	TYPE	LOCATION	ELEMENTS
User Database	Database	—	Full Name, Email Address, Password Hash, Profile Avatar, Organization/Workspace Data

Warning: Never reviewed

#43 **Website Analytics & Optimization**

PURPOSE

Analyze website traffic and user behavior to optimize the shopping experience

LEGAL BASIS

Legitimate Interests

DATA SUBJECTS

Website visitors

DATA CATEGORIES

Identifiers, Behavioural

RECIPIENTS

Analytics provider

RETENTION PERIOD

26 months

AUTOMATED DECISIONS

No

LAST REVIEWED

—

NEXT REVIEW

—

**SYSTEMS / ASSETS**

SYSTEM	TYPE	LOCATION	ELEMENTS
Web Analytics	Cloud Service	—	IP Address, Browsing Behavior, Device Information, Conversion Events

Warning: Never reviewed

#44 **Website/App Analytics — AB Tasty**

PURPOSE

Collect and analyze user behavior data to improve product experience, measure feature adoption, and optimize conversion funnels

LEGAL BASIS

Legitimate Interests

DATA SUBJECTS

Website visitors, App users

DATA CATEGORIES

Identifiers, Behavioural, Location

RECIPIENTS

Analytics provider

RETENTION PERIOD

26 months

AUTOMATED DECISIONS

No

LAST REVIEWED

—

NEXT REVIEW

—

### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
AB Tasty (Analytics & BI)	Cloud Service	—	IP Address, Device Fingerprint, Page Views, Session Duration, Click Events, Referral Source, Browser & OS, Geolocation (City-level)

### INTERNATIONAL TRANSFERS

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
EU	AB Tasty	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

Warning: Never reviewed

### #45 Website/App Analytics — AdTriba

PURPOSE

Collect and analyze user behavior data to improve product experience, measure feature adoption, and optimize conversion funnels

LEGAL BASIS

Legitimate Interests

DATA SUBJECTS

Website visitors, App users

DATA CATEGORIES

Identifiers, Behavioural, Location

RECIPIENTS

Analytics provider

RETENTION PERIOD

26 months

AUTOMATED DECISIONS

No

LAST REVIEWED

NEXT REVIEW

—

**SYSTEMS / ASSETS**

SYSTEM	TYPE	LOCATION	ELEMENTS
AdTriba (Analytics & BI)	Cloud Service	—	IP Address, Device Fingerprint, Page Views, Session Duration, Click Events, Referral Source, Browser & OS, Geolocation (City-level)

**INTERNATIONAL TRANSFERS**

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
EU	AdTriba	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
US	AdTriba	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
UK	AdTriba	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
AU	AdTriba	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

Warning: Never reviewed

#46 **Website/App Analytics — Conductrics**

**PURPOSE**

Collect and analyze user behavior data to improve product experience, measure feature adoption, and optimize conversion funnels

**LEGAL BASIS**

Legitimate Interests

**DATA SUBJECTS**

Website visitors, App users

**DATA CATEGORIES**

Identifiers, Behavioural, Location

**RECIPIENTS**

Analytics provider

**RETENTION PERIOD**

26 months

**AUTOMATED DECISIONS**

No

**LAST REVIEWED**

—

**NEXT REVIEW**

—

**SYSTEMS / ASSETS**

SYSTEM	TYPE	LOCATION	ELEMENTS
Conductrics (Analytics & BI)	Cloud Service	—	IP Address, Device Fingerprint, Page Views, Session Duration, Click Events, Referral Source, Browser & OS, Geolocation (City-level)

**INTERNATIONAL TRANSFERS**

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
US	Conductrics	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
EU	Conductrics	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

Warning: Never reviewed

#47 **Website/App Analytics — Google Analytics**

PURPOSE

Collect and analyze user behavior data to improve product experience, measure feature adoption, and optimize conversion funnels

LEGAL BASIS

Legitimate Interests

DATA SUBJECTS

Website visitors, App users

DATA CATEGORIES

Identifiers, Behavioural, Location

RECIPIENTS

Analytics provider

RETENTION PERIOD

26 months

AUTOMATED DECISIONS

No

LAST REVIEWED

—

NEXT REVIEW

—

**SYSTEMS / ASSETS**

SYSTEM	TYPE	LOCATION	ELEMENTS
Google Analytics (Analytics & BI)	Cloud Service	—	IP Address, Device Fingerprint, Page Views, Session Duration, Click Events, Referral Source, Browser & OS, Geolocation (City-level)

**INTERNATIONAL TRANSFERS**

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
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US	Google Analytics	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
EU	Google Analytics	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

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Warning: Never reviewed

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### #48 Website/App Analytics — Optimizely

**PURPOSE**

Collect and analyze user behavior data to improve product experience, measure feature adoption, and optimize conversion funnels

**LEGAL BASIS**

Legitimate Interests

**DATA SUBJECTS**

Website visitors, App users

**DATA CATEGORIES**

Identifiers, Behavioural, Location

**RECIPIENTS**

Analytics provider

**RETENTION PERIOD**

26 months

**AUTOMATED DECISIONS**

No

**LAST REVIEWED**

—

**NEXT REVIEW**

—

### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Optimizely (Analytics & BI)	Cloud Service	—	IP Address, Device Fingerprint, Page Views, Session Duration, Click Events, Referral Source, Browser & OS, Geolocation (City-level)

### INTERNATIONAL TRANSFERS

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
US	Optimizely	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
EU	Optimizely	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
UK	Optimizely	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

Warning: Never reviewed

### #49 Website/App Analytics — Quantum Metric

**PURPOSE**

Collect and analyze user behavior data to improve product experience, measure feature adoption, and optimize conversion funnels

**LEGAL BASIS**

Legitimate Interests

**DATA SUBJECTS**

Website visitors, App users

**DATA CATEGORIES**

Identifiers, Behavioural, Location

RECIPIENTS

Analytics provider

RETENTION PERIOD

26 months

AUTOMATED DECISIONS

No

LAST REVIEWED

—

NEXT REVIEW

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### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
Quantum Metric (Analytics & BI)	Cloud Service	—	IP Address, Device Fingerprint, Page Views, Session Duration, Click Events, Referral Source, Browser & OS, Geolocation (City-level)

### INTERNATIONAL TRANSFERS

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
US	Quantum Metric	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
EU	Quantum Metric	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

Warning: Never reviewed

## #50 Website/App Analytics — Rokt

PURPOSE

Collect and analyze user behavior data to improve product experience, measure feature adoption, and optimize conversion funnels

LEGAL BASIS

Legitimate Interests

DATA SUBJECTS

Website visitors, App users

DATA CATEGORIES

Identifiers, Behavioural, Location

RECIPIENTS

Analytics provider

RETENTION PERIOD

26 months

AUTOMATED DECISIONS

No

LAST REVIEWED

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NEXT REVIEW

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### SYSTEMS / ASSETS

SYSTEM	TYPE	LOCATION	ELEMENTS
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Rokt (Analytics & BI)	Cloud Service	—	IP Address, Device Fingerprint, Page Views, Session Duration, Click Events, Referral Source, Browser & OS, Geolocation (City-level)
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**INTERNATIONAL TRANSFERS**

DESTINATION	ORGANIZATION	MECHANISM	SAFEGUARDS
US	Rokt	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
EU	Rokt	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures
Australia	Rokt	STANDARD_CONTRACTUAL_CLAUSES	Standard Contractual Clauses (SCCs) with supplementary measures

Warning: Never reviewed