### **PRIVACY NOTICE**

Effective Date: January 1, 2020

This Privacy Notice describes our handling of Personal Information in connection with your presence in our locations and your use of our websites, mobile apps and the services we provide. By using our websites, mobile apps, and services, you hereby consent to these terms.

"Personal Information" refers to information that identifies you as an individual. This Privacy Notice describes how we collect, use, share, and protect your Personal Information, and the choices you have regarding your Personal Information. We encourage you to read this Privacy Notice and to consult our <a href="Privacy Resource Center">Privacy Resource Center</a>.

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## 1. Sources of Personal Information

We receive Personal Information from the following:

- Information You Provide Us Directly. We collect personal and transactional information (purchase-related history) which you provide us directly, for example, in connection with a purchase, a service/event, a promotion, or application for a membership program.
- Information Collected Through Automated Technologies. We use cookies, tags, web beacons and other technologies to track and collect browsing, purchase activity, and personal information. Our mobile applications also collect unique identifiers and geolocation information, if you have enabled locations services on your device.
- Information We Receive from Other Parties. We may obtain information about you
  from other sources for purposes such as prospecting and/or enhancing the information
  you have provided.

To learn more about automated tracking technologies, visit our Privacy Resource Center.

### **Minors**

Our websites and mobile applications are intended for a general audience and are not directed toward minors under 16 years of age, and we do not knowingly collect their Personal Information.

### 2. How We Use the Information We Collect

Personal Information may be used for the following purposes:

- Our Products & Services. We use Personal Information to process and fulfill your orders, refunds or exchanges, requests for products, services or information, to provide customer service, to administer our credit card programs, to personalize your shopping experience, to identify your preferences, and to provide you services across multiple devices.
- Marketing and Advertising. We use Personal Information to administer promotions, contests, sweepstakes, and rewards programs and to market products and services, including serving you interest-based advertising. For more information on interestbased advertising, see our <u>Privacy Resource Center</u>.
- Other Uses. We use Personal Information for other reasons, including conducting sales research and analysis; preventing or mitigating fraud and credit risk; and complying with legal matters, investigations, and applicable laws and regulations.

### 3. How We Share Your Personal Information

We may share your Personal Information with other parties in the following instances:

- With Our Third Parties: To process transactions or provide products or services on our behalf, including but not limited to providers of product delivery services (for example, UPS and FedEx) and website analytics (for example, Google Analytics).
- For Marketing Purposes: To notify you of offers for products or services that may be of interest to you. We do not share credit card or other financial information for marketing purposes.
- For Corporate Transactions: In connection with a merger, acquisition or sale involving all or a portion of our company.
- Other Reasons: To: (a) satisfy applicable law, regulations, legal process or valid governmental request; (b) enforce the terms of use applicable to our services, (c) detect, prevent or mitigate fraud or security or technical issues; or (d) protect against imminent harm to the rights, property or safety of our company, our customers or the public as required or permitted by law.

## 4. Your Choices Regarding Your Personal Information

## a. To Stop Certain Collection and Use of Your Personal Information:

### Marketing Emails, Texts and Mail

- You can stop promotional emails from us by using the "unsubscribe" link on our promotional emails.
- You can stop marketing text messages, by replying "STOP" our promotional text messages.
- You can stop promotional postal mail by contacting us with your request as noted in the <a href="How to Contact Us">How to Contact Us</a> section below.

### **Interest Based Advertising**

Some of our websites support Interest Based Advertising efforts by Third Parties. Industry groups such as the <u>Digital Advertising Alliance</u> have developed services to help you manage your Interest Based Advertising preferences.

### **Website Analytics**

You can opt-out of tracking used to understand website utilization provided by Google Analytics by visiting <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>.

### Do Not Track

Some browsers have a "Do Not Track" feature that lets you send a request to websites to not track your online activities. We, like many other retailers, do not honor those requests.

## b. To Change or Correct Your Personal Information

At any time, you can request access to your personal information, request that any inaccuracies be corrected, or request that comments or explanations be added to records about you.

You may contact us with changes as described in the <u>How to Contact Us</u> section. To prevent unauthorized changes, we may ask for certain information to verify your identity before we process such requests.

Although we will do our best to make your requested changes, in some cases for example, if it requires a disproportionate technical or practical cost or effort or if it conflicts with our legal obligations or business requirements, we may be unable to do so completely. Should this occur, we will communicate that to you.

### 5. How We Protect Your Personal Information

We employ technical, physical and administrative safeguards to protect your Personal Information and require Third Parties with whom we work to do the same. However, we cannot guarantee your information will be completely safe against unauthorized access. Please use caution when sharing your information with others and take appropriate measures to protect the confidentiality of your username and password. Some practical tips are available in the Privacy Resource Center.

If you think the Personal Information you provided to us has been improperly accessed or used, or if you suspect that unauthorized purchases have been made on our websites using your Personal Information, please <u>Contact Us</u> immediately.

Our websites may contain links to, or plugins or widgets from, social media or other websites operated and maintained by Third Parties. These properties, which we do not control, operate independently and have their own privacy practices and statements, which we encourage you to review.

# 6. Customer Specific Disclosures

### a. Contract Customers

If you are a contract customer and would like to opt-out of receiving promotional postal mail and/or email from us, please notify your Account Manager. You may still receive promotional postal mail or email from other affiliated companies and Third Parties if they have received your email or postal address from other sources or as a result of their own transactions or experiences with you. You will also continue to receive promotional postal mail or email if you request to hear from us again.

### **b.** Nevada Residents

Under Nevada SB 220, Nevada residents may submit an opt-out request regarding the sale of their Personally Identifiable Information (PII) collected through a website or online service. Where applicable, you may submit your request to Opt-Out of the sale of Personal Information to Third Parties by submitting an online request at: <a href="Do Not Sell My Personal Information">Do Not Sell My Personal Information</a>

### c. California Residents

## 1. California Shine the Light Law

Under California Civil Code sections 1798.83–1798.84 California residents may request the names and addresses of affiliated companies and categories of Personal Information we share for their direct marketing purposes. If you are a California resident and would like to make such a request, please Contact Us.

## 2. California Consumer Privacy Act of 2018

California residents have the following rights:

- 1. The Right to Disclosure
  - a. About information collected
  - b. About information sold
    - i. Categories of personal information sold
    - ii. Categories of Third Parties with whom the personal information was sold
- 2. The Right to Deletion of Personal Information
- 3. The Right to Opt-Out of the sale of Personal Information to Third Parties
- 4. The Right to Sue for Security Breaches
- 5. The Right to not be Discriminated Against Based on Exercising any of the Above Rights

California residents may submit a Data Disclosure request by:

- 1. Submitting an online request here: Data Disclosure Request
- 2. Submitting a phone request by calling 1-800-333-0333

California residents may submit a Data Deletion request by:

- 1. Submitting an online request here: Data Deletion Request
- 2. Submitting a phone request by calling 1-800-333-0333

Where applicable, you may submit your request to Opt-Out of the sale of your Personal Information to Third Parties by:

- 1. Submitting an online request here: Do Not Sell My Personal Information
- 2. Clicking the "Do Not Sell My Personal Information" button on our applicable website

Unless indicated with a "Do Not Sell My Personal Information" button on our websites, we do not sell Personal Information as defined by the California Consumer Privacy Act (CCPA).

We will take reasonable steps to verify your identity prior to fulfilling the above requests.

Authorized Agents may submit requests on behalf of a California resident using the above processes and providing the appropriate documentation.

The following section describes:

- 1. Categories of personal information we collect
- 2. The purpose for which the personal information is collected

- 3. Specific personal information collected
- Categories of sources from which that information is collected
   Categories of Third Parties (who are not classified service providers) with whom the information may be shared
- 6. The purpose for selling or sharing of personal information

Categories of Personal Information as defined by CCPA	Do we collect this type of Personal Information?	Purpose of collecting the Personal Information	Specific Personal Information that may be Collected	Categories of Sources from which the Personal Information is Collected	Is this category of Personal Information shared with Third Parties?	Categories of Third Parties with which the Personal Information may be Shared	Purpose of Selling or Sharing Personal Information	Can you opt-out of this Sharing?
Identifiers	Yes	To uniquely identify an individual in support of business activities	Names, Account ids, emails, addresses, IP Addresses, Device Identifiers, Loyalty Program Ids, Tax Exempt Numbers	From you, From Marketing Firms	Yes	Marketing Partners	Marketing	Yes
Commercial Information	Yes	To support business transaction	Quotes, Sales Transactions,	Your transactions with us	Yes	Marketing Partners	Marketing	Yes
Biometrics	In limited circumstances	Fraud Protection	Behavioral biometrics and device usage	From you	No	N/A	N/A	N/A
Network Activity	Yes (if you access our websites or mobile apps)	To allow access to and optimize our websites	Access to our properties	From you	No	N/A	N/A	N/A
Geolocation Data	Yes (if you access our websites or mobile apps)	Personalization and Store Locations	Unique Identifiers and your location and ZIP code	From you and your devices	No	N/A	N/A	N/A
Recordings (e.g. audio, visual)	Yes (if you call customer service or visit a store using closed circuit TV)	Customer Service, Fraud Prevention	Voice and CCTV Recordings	From you	No	N/A	N/A	N/A
Professional or Employment- Related Information	Yes	For employment and credit purposes	Employment History including Companies and Job Titles	From you	Yes	Prior Employers and Background Check Services	Employment Background	No
Education Information	Yes	For employment and credit purposes	Educational History including Schools and programs	From you	Yes	Verification Services	Employment and Credit Verification	No
Inferences	Yes	Personalization	Product Affinities	From you and external data sources	In limited circumstances	Marketing Partners	Marketing	Yes

#### Minors:

We do not knowingly collect or sell the Personal Information of minors under the age of 16 without affirmative authorization.

As an additional resource, you may also contact us at <a href="ConsumerRightsRequest@Staples.com">ConsumerRightsRequest@Staples.com</a> for any additional questions related to the rights granted under the California Consumer Privacy Act (CCPA).

### d. Canadian Residents

We consider "personal information" to be information about an identifiable individual. We do not consider public information found in directories and listings, or business names, addresses and/or contact numbers to be personal information.

We have adopted, as Company policy, the 10 personal information privacy principles stated in the Canadian Standards Association (CSA) Model Code for the Protection of Personal Information. The 10 principles are:

- 1. Accountability
- 2. Reason for Collection
- 3. Consent
- 4. Limiting Collection
- 5. Limiting User, Disclosure and Retention
- 6. Accuracy
- 7. Safeguards
- 8. Openness
- 9. Individual Access
- 10. Challenging Compliance

### Interest Based Advertising

Some of our websites support Interest Based Advertising efforts by Third Parties. In Canada industry groups such as <u>Digital Advertising Alliance of Canada</u> have developed services to help you manage your Interest Based Advertising preferences.

### e. European Union (EU) Residents

Staples and its affiliated companies are based in the United States (U.S.) and the information Staples and its service providers collect is governed by U.S. law. If you are accessing the Services from outside of the U.S., please be aware that information collected through the services may be transferred to, processed, stored, and used in the U.S. Data protection laws in the U.S. may be different from those of your country of residence. Your use of the services or provision of any information therefore constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of your information, including Personal Information, in the U.S. as set forth in this Privacy Notice.

As residents of the EU, you will have certain additional rights with respect to your Personal Data under the General Data Protection Regulation including:

- 1. The right to be informed.
- 2. The right of access.
- 3. The right to rectification.

- 4. The right to erasure.
- 5. The right to restrict processing.
- 6. The right to data portability.
- 7. The right to object.

### Interest Based Advertising

Some of our websites support Interest Based Advertising efforts by Third Parties. In Europe industry groups such as <u>European Interactive Digital Advertising Alliance</u> have developed services to help you manage your Interest Based Advertising preferences.

For more information, see the Privacy Resource Center.

We will retain your EU Personal Information for as long as your account is active, as needed to provide you services and to fulfill the purposes for which the data was collected, and as necessary to comply with our legal obligations and fulfill our business needs.

## 7. How to Contact Us

This Privacy Notice applies to Staples, Inc. and its affiliated companies.

Please direct any questions, complaints or concerns regarding this Privacy Notice and our treatment of your Personal Information to any of the following:

Primary contact by email: <a href="mailto:privacy@staples.com">privacy@staples.com</a>

Alternate contact by phone: (+1) 800-333-3330 (US only)

or by writing to: Staples

**Privacy and Compliance** 

**500 Staples Drive** 

Framingham, MA 01702 US

Upon receiving a written request, we will contact you directly, investigate your request, and work to address your concerns. We will respond to your request without undue delay. We reserve the right to take reasonable steps to verify your identity prior to granting access or processing changes or corrections.

## 8. Privacy Notice Updates

This Privacy Statement may change from time to time, and we will post on our websites any updated Privacy Notice. Recent changes to the Privacy Notice are documented below. Each version of this Privacy Notice will be identified by its effective date displayed at the top of this Privacy Notice.

What has changed:

V2.0	January 01,	Added California Consumer Privacy Act (CCPA)
	2020	rights. Expanded Canadian Residents section with

		<ul> <li>information provided previously in a separate document.</li> <li>Changed the title of this document from Privacy Policy to a Privacy Notice, reflecting trend to use the word "Notice" when referring to public notifications while using the term "Policy" for internal communications.</li> <li>Updated the Nevada resident opt-out instructions</li> </ul>
V1.1	October 1, 2019	Addition of language addressing the Nevada Data Privacy Law
V1.0	May 25, 2018	Reorganization and Standardization of Privacy     Policy and Introduction of the Privacy Resource     Center
V0.1	March 23, 2017	<ul> <li>Removed references to the US-EU and US-Swiss Safe Harbor programs which have or will be discontinued.</li> </ul>