

PRIVACY NOTICE

Effective Date: March 1, 2024
Version 6.0

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

“Personal Information” refers to both online and offline information that identifies you or that can be reasonably linked to you as an individual.

We encourage you to read this Privacy Notice which describes how we collect, use, disclose, share/sell, and protect your Personal Information, and the choices you have regarding your Personal Information.

Please note that if you are a current or former employee or job candidate, your Personal Information collected in that context is subject to our Workforce Privacy Notice rather than this Privacy Notice. This Privacy Notice applies to your interaction with our companies as a prospective, current, or former customer, visitor, or business partner.

1. Personal Information Collected and How It is Collected

Types of Personal Information that we, or our service providers on our behalf, may collect:

- Name and contact information such as postal address, email address, and phone number
- Digital information, including your device IDs, browsing/search history, referring URL, browser, operating system, IP/MAC address, and your direct interactions on our websites or mobile apps such as text typed, pages visited, links clicked, keystrokes/cadence, and mouse movements
- Your transaction information, including purchases/returns/exchanges of products and services and your loyalty program activity information
- Payment card number and other payment information
- Your Account Number or Loyalty Program ID

In certain situations, we, or our service providers on our behalf, may also collect data such as:

- Driver's license number (for example, if you return a product)
- Signatures (for proof of delivery or shipment receipt tracking)
- Location or address information (such as when you manually provide your location and ask us to tell you about nearby stores, when you allow location sharing via our mobile apps, or when you provide address information for package shipping services)

Note: We utilize the Google Maps API(s) for some services, please see the [Google Privacy Policy](#) for more information.

- Demographic and preference information (to help find products or services that may be of interest to you)
- Survey responses, chat sessions, and feedback (regarding products/services purchased, customer service interactions, and your customer experience)
- Advertising interactions (such as cookie IDs, device advertising IDs, which ad was served, and the URLs where the ads are served when you interact with our emails or online/mobile ads)
- Voice, chat, video, and CCTV Recordings (for example, calls and messaging with customer service, our sales team, or chat vendor for quality assurance, training, or analysis, or when visiting stores that use security cameras (video only))
- School or educator affiliations (based on program participation)
- Photos, images, writings, and other files you provide to us (if you receive product deliveries or request certain services from us)
- Employer name and business contact information (if your company has a business relationship with us)
- Your postal mail and package shipping data (if you participate in those programs or services with us)
- Your business contact, relationship, or firmographic, or transactional information (if interacting with us in a business-to-business scenario)
- Travel related information (if you utilize travel services)
- Information used to help detect fraud and prevent cybercrime
- Inferences drawn from or created based on some of the information identified above (such as products you may be interested in)

Personal Information is collected from the following:

- **Information You Provide Us Directly.** We collect Personal Information from you directly, for example, in connection with a purchase (in-person or via our websites or mobile apps), a service, a promotion/event, a customer service request, a survey, a sweepstakes/contest, or an application for a membership program. When using our mobile apps, we may also ask you to grant us access to the camera, photo library, or microphone on your mobile device to enable certain features such as scanning bar codes and speech-enabled search.
- **Information Collected Through Automated Technologies.** We and our partners may use cookies, tags, web beacons and other technologies on our web properties and mobile applications to track and collect some Personal Information made available through your activity on our sites/apps, such as device/browser attributes, shopping/search activity, shopping cart abandonment, and other interactions with our online services. We, and our technology partners, may collect your direct interactions on our websites or mobile apps such as text typed, pages visited, links clicked, keystrokes/cadence, and mouse movements to monitor how you interact with our website, for fraud detection, and for troubleshooting purposes. We also use cookies to enable core site functionality, to analyze website usage so that we can measure and improve services and performance, and to serve ads that are relevant to your interests. Cookies “remember” your device/browser when you return to a website and make your experience more personalized and user-friendly and allow us to better understand how our websites are used to improve the experience.

We and our partners may collect information via technology if you visit our locations (such as CCTV footage and security incident data collection) or use certain services (such as your interaction with demo products or partner services).

If you use a mobile device, your device may disclose location information (when you enable location services) with our websites, mobile applications, services, or our service providers. For example, precise geo-location can be used to help you find our nearby locations.

- **Information We Receive from Other Sources.** We may obtain information about you from other sources to enhance our existing information for purposes such as prospecting, marketing, fraud detection, evaluating credit risk, and/or improving the information you have provided.

Our sites and mobile applications may allow you to sign-in to our digital property using a social media network login and we may also include other social media features, such as a “share this” button. In these cases, we may receive information from the social media network, including your profile information, picture, user ID associated with your social media account, and other information you permit the social media network to disclose with partners. The data we receive from these social media networks is dependent upon their policies and your privacy settings on that partner site. You should always review and, if necessary, adjust your privacy settings on these websites and services before utilizing these features.

We may collect information from publicly available sources, including information you submit in a public forum (such as a blog, chat room, or social media).

Minors

Our websites and online mobile applications are not directed toward children under 13 years of age. We do not knowingly collect online Personal Information of children under 13 years of age without parental/guardian consent.

2. How We Use Personal Information

Personal Information may be used for the following purposes or as otherwise specified in this notice:

- **To Communicate with You and to Provide, Support, and Improve our Products, Services, and Programs.** We use Personal Information to process your orders, purchases, refunds/exchanges, and requests for products, services, or information. We may also use your Personal Information to create and maintain your accounts, to enable order shipment tracking notifications, to provide customer service, to administer our credit card/gift card programs, to personalize your shopping experience, to identify your preferences, to draw inferences, to provide you services across multiple devices, to improve the functioning and performance of our digital properties, to enable certain mobile app functionality (such as using your location to help you find our nearby locations), to support our partner programs, and to expand our product/service offerings. We also use your personal information to administer our rewards/loyalty programs.

- **Marketing and Advertising.** We use Personal Information to communicate and/or administer our sales/prospecting programs, promotions, contests, sweepstakes, and surveys, and to make you aware of our products and services. We may use your Personal Information to better predict your product/service preferences or interests. We may also evaluate your interactions with our emails/advertisements and activity on websites/applications to serve you personalized advertising in order to show you content that is more likely to be of interest to you and to measure advertising effectiveness. (See section 4 below for additional information regarding our Marketing activities.)
- **Other Uses.** We use Personal Information for other reasons, including conducting sales research and analysis; preventing or mitigating fraud, illegal activity, and credit risk; support our core business functions; and relating to or complying with legal matters, investigations, and applicable laws and regulations.

3. When We Disclose Personal Information

We may disclose your Personal Information within our family of companies for purposes such as preference management, marketing, customer service functions, and improved user experiences.

We may also disclose your Personal Information outside our family of companies (for example, with partners such as service providers, data processors, contractors, etc.) for various purposes such as:

- **Providing the Products or Services you Requested:** To process transactions or provide products or services on our behalf. Examples include fulfilling orders for products or services, delivering packages, sending communications, analyzing data, processing payments, transmitting content, managing credit/collections, administering programs, and providing customer service. We may also exchange your Personal Information with our business partners and our business clients when you take part in certain programs or purchase from certain sites operated by us.
- **Sales and Marketing Purposes:** To assess, develop, and administer sales and marketing programs, and notify you of promotions and offers for products or services that may be of interest to you.
- **Corporate Transactions:** In connection with a merger, acquisition or sale involving all or a portion of our company.
- **Other Reasons:** Such as to enhance data and digital properties; to improve our websites/mobile apps and internal business processes; to enhance product review content on other platforms; to participate in commercial trade credit programs; to enforce the terms of use applicable to our services; to detect, prevent, or mitigate fraud and credit risk, security, or technical issues; to satisfy applicable law, regulations, legal processes, or valid governmental requests; and to protect against imminent harm to the rights, property or safety of our company, our customers or the public as required or permitted by law.
- **With Your Consent:** In circumstances other than those described in this notice.

4. How We Use Personal Information for Marketing

a. Digital Marketing

We participate in digital advertising to present you with online ads for our products and services that we believe may be of interest to you. We may partner with advertising companies and other third-party companies to infer your interests, identity, or intent and display content, offers or advertising that is tailored to you based on how you browse and shop both on and off our sites and your interactions with personalized ads or content. As a result, you may see ads on our digital properties or third-party digital properties based on your affiliation, purchases, search history, or web/mobile browsing activities (for instance, an ad from us may be displayed to you on another website if you recently browsed for office supplies). These interest-based ads (also sometimes called “personalized or targeted ads”) are displayed to you based on information collected from your online interactions across multiple websites that you visit, or across multiple devices you may use. Under applicable law in certain jurisdictions, the disclosure of your personal information to third parties in connection with cross-context behavioral advertising, targeted advertising, or advertising analytics may be considered a “sale” or “sharing” of personal information.

b. Email Marketing

We may use your email address to deliver marketing information, product recommendations, and non-transactional communications about us via email.

c. Direct Mail Marketing

We may use your mailing address to deliver notices of new services/partnerships, offers/coupons, printed catalogs, etc. about us or our products or services via direct mail.

d. Text-Based (SMS) or Notification Marketing

We may send you promotional text messages (SMS) when you opt-in to receiving them. We may also send you push notifications to your device when you have our mobile app installed.

5. Your Choices Regarding Your Personal Information

a. To Stop Certain Collection and Use of Your Personal Information: Emails, Texts, Mail, and Notifications

- You can stop promotional emails from us by using the “unsubscribe” link in the footer on our promotional emails or contacting us if you have questions.
- You can stop text messages by replying “STOP” to our text messages.
- You can request to stop postal mail by contacting us as noted in section 8 below.
- You can stop in-app push notifications from our mobile apps by adjusting your Notification Settings.

Please note that if you opt out of receiving promotional communications from us, we may still send you transactional/program communications, including emails about your online account, rewards or loyalty program account, membership program, or purchases. If you have any questions regarding transactional communications, please see Section 8 below to contact us.

If you are receiving any other communications, have any questions, or continue to receive communications after opting out, please e-mail us at Info@Staples.com. Please include any relevant information such as a forwarding of the email received, specification of the order number in question, screenshot of the online message, scan of the mailed marketing artifact, etc. Please note that you may continue to receive communications while we process your request.

If you have any questions regarding the above, please contact us at Privacy@Staples.com.

Interest Based Advertising

Industry groups such as the Digital Advertising Alliance and the Network Advertising Initiative have developed services to help you manage your Interest Based Advertising preferences. Please note that if you opt-out of Interest-Based Advertising, you may still see our ads, but they may not be as relevant to you.

If your preferences or controls are configured to limit cookies/pixels, and you subsequently erase your cookies, use a different device, or change web browsers, your opt-out may become ineffective and may need to be repeated.

You may visit the following sites to become more familiar with these entities, their terms and privacy notices, and their unsubscribe options:

- The Digital Advertising Alliance (DAA): <https://digitaladvertisingalliance.org/>
- The Network Advertising Initiative (NAI): <https://optout.networkadvertising.org/?c=1>
- The Interactive Advertising Bureau (IAB): <https://www.iab.com/>

Website Analytics

We use Google Analytics on our websites to collect usage data, to analyze how users use the websites and to provide advertisements to you on other websites. For more information about how to opt out of having your information used by Google Analytics, visit <https://tools.google.com/dlpage/gaoptout/>.

Mobile Apps

If you have granted our mobile apps access to your device's camera, microphone, location, etc., you may revoke such access by configuring the permissions located in your device's "Settings".

Cookie Preferences

You may adjust your cookie preferences using various privacy plug-ins, opt out mechanisms, or browsers, or, on some of our sites, by using the link in the footer of our website. Please note that if you clear all cookies on your browser, or use a different browser or computer, you may need to complete the opt-out procedure again.

b. To Correct Your Personal Information

You can request that inaccuracies pertaining to your Personal Information be corrected.

You can update some information by logging into your account or you may contact us as described in section 8 below with changes. To prevent unauthorized changes, we may ask for certain information to verify your identity before we process such requests.

We may not fulfill your request 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.

6. How We Protect Your Personal Information

We employ technical, physical, administrative, and organizational safeguards to help protect your Personal Information, including when you use our websites, mobile apps, in-store devices/equipment, services, etc.

Our websites may contain links to other websites, services, social media platforms, etc. operated and maintained by partners. We may also provide social media features that enable you to disclose information with social networks and to interact with us on various social media sites. Your use of these features may result in the collection or sharing of information about you, depending on the feature. These properties, which we do not control, operate independently, and have their own privacy and security practices and statements, which we encourage you to review to make sure you understand the information that may be collected, used, and disclosed by those sites and how it is protected.

Unfortunately, no internet transmission, e-commerce solution, website, mobile application, database, or system can be guaranteed to be 100% secure. As a result, while we strive to protect your Personal Information, we cannot guarantee or warrant the security of the information you transmit to or from us. You should also take steps to protect your personal information against unauthorized disclosure or misuse:

- We urge you to keep your passwords secure and confidential and not divulge them to anyone, use different and complex passwords for each account and consider using a commercially available Password Locker or Vault to generate and store your passwords.
- Remember to log off your account and close your app/browser window when you have finished your visit. This is to help ensure that others do not access your account, especially if you are sharing a computer with someone else or are using a computer in a public place.
- Other public online safety resources:
 - <https://staysafeonline.org> (National Cyber Security Alliance)
 - <https://www.consumer.ftc.gov> (FTC)
 - <https://www.aarp.org> (AARP)
 - <https://www.bbb.org> (Better Business Bureau)

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 see Section 8 below to contact us immediately.

7. Customer-Specific Disclosures

a. Contract or Business Customers

If you are a contract customer and have questions pertaining to your account or would like to opt-out of receiving promotional postal mail and/or email from us, please notify your Account Manager.

If you are a business entity receiving unsolicited communications from us and do not have an Account Manager, please see Section 8 below to contact us.

b. Colorado Residents

This section applies specifically to residents of Colorado, in addition to all other non-state specific information contained in this Notice and sections 7.k. and 7.l. below.

Colorado residents and their Authorized Agents have the following rights under the Colorado Privacy Act (CPA):

- **Right to Know and Access.** You have the right to confirm whether or not we are processing your personal information and to know what personal information the business has collected about you. While our table in section 7.h. below describes the personal information we collect about you, you have the right to make a request to know and get access to information that is specific to you, should we have any.
- **Right to Delete.** You have the right to request that we delete personal information we have collected from you or obtained about you, subject to certain exceptions. For example, we will not delete any personal information required to provide our existing services to you or that we must maintain to comply with our legal/financial obligations.
- **Right to Correct.** You may request that we correct inaccurate information we maintain about you, subject to some exceptions and, if necessary, independent verification of the information.
- **Right to Opt-Out.** You may opt out of the processing of your personal information for purposes of (i) targeted advertising, (ii) the sale of personal information, or (iii) profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.
- **Right to Non-Discrimination.** You have the right not to be discriminated against if you exercise any of these rights. Please note that a legitimate denial of a request to know or access, delete, correct, or opt out is not discriminatory, nor is charging a fee for excessive or repetitive consumer requests as permitted by the CPA.

Targeted Advertising:

We may participate in targeted advertising. You have the Right to Opt-Out of this advertising, as described above.

Appeal Process:

Colorado residents may submit an appeal for refusals to take action on your request by emailing Privacy@Staples.com with your name, email address, phone number and request id of the original request.

De-identified Data:

In instances where we de-identify your Personal Information to prevent it from being linked to you as an individual, we will maintain and use it in a de-identified format and will not attempt to re-identify the Personal Information.

Opt-Out Signal:

An opt-out preference signal may be sent by certain platforms, technologies, or mechanisms on your behalf to communicate your choice to opt out of the sale/sharing of your personal information. Opt-out preference signals will opt you out of the selling/sharing of personal information at the browser level.

To exercise the rights applicable to you, see instructions below in section **7.I. How to Exercise Your State-Specific Privacy Rights.**

As an additional resource, you may also contact us at Privacy@Staples.com for any additional questions related to the rights granted under the CPA.

c. Connecticut Residents

This section applies specifically to residents of Connecticut, in addition to all other non-state specific information contained in this Notice and sections 7.k. and 7.l. below.

Connecticut residents and their Authorized Agents have the following rights under the Connecticut Data Privacy Act (CTDPA):

- **Right to Know and Access.** You have the right to confirm whether or not we are processing your personal information and to know what personal information the business has collected about you. While our table in section 7.h. below describes the personal information we collect about you, you have the right to make a request to know and get access to information that is specific to you, should we have any.
- **Right to Delete.** You have the right to request that we delete personal information we have collected from you or obtained about you, subject to certain exceptions. For example, we will not delete any personal information required to provide our existing services to you or that we must maintain to comply with our legal/financial obligations.
- **Right to Correct.** You may request that we correct inaccurate information we maintain about you, subject to some exceptions and, if necessary, independent verification of the information.
- **Right to Opt-Out.** You may opt out of the processing of your personal information for purposes of (i) targeted advertising, (ii) the sale of personal information, or (iii) profiling in furtherance of solely automated decisions that produce legal or similarly significant effects concerning you.
- **Right to Non-Discrimination.** You have the right not to be discriminated against if you exercise any of these rights. Please note that a legitimate denial of a request to know or access, delete, correct, or opt out is not discriminatory as permitted by the CTDPA.

Targeted Advertising:

We may participate in targeted advertising and/or the sale of data. You have the Right to Opt-Out of this processing as described above.

Appeal Process:

Connecticut residents may submit an appeal for refusals to take action on your request by emailing Privacy@Staples.com with your name, email address, phone number and request id of the original request.

De-identified Data:

In instances where we de-identify your Personal Information to prevent it from being linked to you as an individual, we will maintain and use it in a de-identified format and will not attempt to re-identify the Personal Information.

To exercise the rights applicable to you, see instructions below in section **7.I. How to Exercise Your State-Specific Privacy Rights.**

As an additional resource, you may also contact us at Privacy@Staples.com for any additional questions related to the rights granted under the CTDPA.

d. Montana Residents (effective 10/1/24)

This section applies specifically to residents of Montana, in addition to all other non-state specific information contained in this Notice and sections 7.k. and 7.l. below.

Montana residents and their Authorized Agents have the following rights under the Montana Consumer Data Privacy Act (MCDPA):

- **Right to Know and Access.** You have the right to confirm whether or not we are processing your personal information and to know what personal information the business has collected about you. While our table in section 7.h. below describes the personal information we collect about you, you have the right to make a request to know and get access to information that is specific to you, should we have any.
- **Right to Delete.** You have the right to request that we delete personal information we have collected from you or obtained about you, subject to certain exceptions. For example, we will not delete any personal information required to provide our existing services to you or that we must maintain to comply with our legal/financial obligations.
- **Right to Correct.** You may request that we correct inaccurate information we maintain about you, subject to some exceptions and, if necessary, independent verification of the information.
- **Right to Opt-Out.** You may opt out of the processing of your personal information for purposes of (i) targeted advertising, (ii) the sale of personal information, or (iii) profiling in furtherance of solely automated decisions that produce legal or similarly significant effects concerning you.
- **Right to Non-Discrimination.** You have the right not to be discriminated against if you exercise any of these rights. Please note that a legitimate denial of a request to know or access, delete, correct, or opt out is not discriminatory, nor is charging a fee for excessive or repetitive consumer requests as permitted by the MCDPA.

Targeted Advertising:

We may participate in targeted advertising. You have the Right to Opt-Out of this advertising, as described above.

Appeal Process:

Montana residents may submit an appeal for refusals to take action on your request by emailing Privacy@Staples.com with your name, email address, phone number and request id of the original request.

De-identified Data:

In instances where we de-identify your Personal Information to prevent it from being linked to you as an individual, we will maintain and use it in a de-identified format and will not attempt to re-identify the Personal Information.

To exercise the rights applicable to you, see instructions below in section **7.I. How to Exercise Your State-Specific Privacy Rights.**

As an additional resource, you may also contact us at Privacy@Staples.com for any additional questions related to the rights granted under the MCDPA.

e. 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. You may submit your request to Opt-Out of the sale of Personal Information to third parties by submitting an online request at: [Do Not Sell My Personal Information](#)

f. Oregon Residents (effective 7/1/24)

This section applies specifically to residents of Oregon, in addition to all other non-state specific information contained in this Notice and sections 7.k. and 7.l. below.

Oregon residents and their Authorized Agents have the following rights under the Oregon Consumer Privacy Act (OCPA):

- **Right to Know and Access.** You have the right to confirm whether or not we are processing your personal information and to know what personal information the business has collected about you. While our table in section 7.h. below describes the personal information we collect about you, you have the right to make a request to know and get access to information that is specific to you, should we have any.
- **Right to Delete.** You have the right to request that we delete personal information we have collected from you or obtained about you, subject to certain exceptions. For example, we will not delete any personal information required to provide our existing services to you or that we must maintain to comply with our legal/financial obligations.
- **Right to Correct.** You may request that we correct inaccurate information we maintain about you, subject to some exceptions and, if necessary, independent verification of the information.
- **Right to Opt-Out.** You may opt out of the processing of your personal information for purposes of (i) targeted advertising, (ii) selling the personal data, or (iii) profiling in furtherance of decisions that produce legal effects or effects of similar significance concerning you.
- **Right to Non-Discrimination.** You have the right not to be discriminated against if you exercise any of these rights. Please note that a legitimate denial of a request to know or access, delete, correct, or opt out is not discriminatory, nor is charging a fee for excessive or repetitive consumer requests as permitted by the OCPA.

Targeted Advertising:

We may participate in targeted advertising. You have the Right to Opt-Out of this advertising, as described above.

Appeal Process:

Oregon residents may submit an appeal for refusals to take action on your request by emailing Privacy@Staples.com with your name, email address, phone number and request id of the original request.

De-identified Data:

In instances where we de-identify your Personal Information to prevent it from being linked to you as an individual, we will maintain and use it in a de-identified format and will not attempt to re-identify the Personal Information.

To exercise the rights applicable to you, see instructions below in section **7.I. How to Exercise Your State-Specific Privacy Rights.**

As an additional resource, you may also contact us at Privacy@Staples.com for any additional questions related to the rights granted under the OCPA.

g. Texas Residents (effective 7/1/24)

This section applies specifically to residents of Texas, in addition to all other non-state specific information contained in this Notice and sections 7.k. and 7.l. below.

Texas residents and their Authorized Agents have the following rights under the Texas Data Privacy and Security Act (TDPSA):

- **Right to Know and Access.** You have the right to confirm whether or not we are processing your personal information and to know what personal information the business has collected about you. While our table in section 7.h. below describes the personal information we collect about you, you have the right to make a request to know and get access to information that is specific to you, should we have any.
- **Right to Delete.** You have the right to request that we delete personal information we have collected from you or obtained about you, subject to certain exceptions. For example, we will not delete any personal information required to provide our existing services to you or that we must maintain to comply with our legal/financial obligations.
- **Right to Correct.** You may request that we correct inaccurate information we maintain about you, subject to some exceptions and, if necessary, independent verification of the information.
- **Right to Opt-Out.** You may opt out of the processing of your personal information for purposes of (i) targeted advertising, (ii) the sale of personal data, or (iii) profiling in furtherance of a decision that produces a legal or similarly significant effect concerning you.
- **Right to Non-Discrimination.** You have the right not to be discriminated against if you exercise any of these rights. Please note that a legitimate denial of a request to know or access, delete, correct, or opt out is not discriminatory, nor is charging a fee for excessive or repetitive consumer requests as permitted by the TDPSA.

Targeted Advertising:

We may participate in targeted advertising. You have the Right to Opt-Out of this advertising, as described above.

Appeal Process:

Texas residents may submit an appeal for refusals to take action on your request by emailing Privacy@Staples.com with your name, email address, phone number and request id of the original request.

De-identified Data:

In instances where we de-identify your Personal Information to prevent it from being linked to you as an individual, we will maintain and use it in a de-identified format and will not attempt to re-identify the Personal Information.

To exercise the rights applicable to you, see instructions below in section **7.I. How to Exercise Your State-Specific Privacy Rights.**

As an additional resource, you may also contact us at Privacy@Staples.com for any additional questions related to the rights granted under the TDPSA.

h. Utah Residents

This section applies specifically to residents of Utah, in addition to all other non-state specific information contained in this Notice and sections 7.k. and 7.l. below.

Utah residents have the following rights under the Utah Consumer Privacy Act (UCPA):

- **Right to Know and Access.** You have the right to confirm whether or not we are processing your personal information and to know what personal information the business has collected about you. While our table in section 7.h. below describes the personal information we collect about you, you have the right to make a request to know, get access to, and obtain a copy of information you provided to us that is specific to you, should we have any.
- **Right to Delete.** You have the right to request that we delete personal information we have collected from you, subject to certain exceptions. For example, we will not delete any personal information required to provide our existing services to you or that we must maintain to comply with our legal/financial obligations.
- **Right to Opt-Out.** You may opt out of the processing of your personal information for purposes of (i) targeted advertising or (ii) the sale of personal information.
- **Right to Non-Discrimination.** You have the right not to be discriminated against if you exercise any of these rights. Please note that a legitimate denial of a request to know or access, delete, or opt out is not discriminatory, nor is charging a fee for excessive or repetitive consumer requests as permitted by the UCPA.

To exercise the rights applicable to you, see instructions below in section **7.I. How to Exercise Your State-Specific Privacy Rights.**

As an additional resource, you may also contact us at Privacy@Staples.com for any additional questions related to the rights granted under the UCPA.

i. Virginia Residents

This section applies specifically to residents of Virginia, in addition to all other non-state specific information contained in this Notice and sections 7.k. and 7.l. below.

Virginia residents have the following rights under the Virginia Consumer Data Protection Act (VCDPA):

- **Right to Know and Access.** You have the right to confirm whether or not we are processing your personal information and to know what personal information the business has collected about you. While our table in section 7.h. below describes the personal information we collect about you, you have the right to make a request to know and get access to information that is specific to you, should we have any.
- **Right to Delete.** You have the right to request that we delete personal information we have collected from you or obtained about you, subject to certain exceptions. For example, we will not delete any personal information required to provide our existing services to you or that we must maintain to comply with our legal/financial obligations.
- **Right to Correct.** You may request that we correct inaccurate information we maintain about you, subject to some exceptions and, if necessary, independent verification of the information.
- **Right to Opt-Out.** You may opt out of the processing of your personal information for purposes of (i) targeted advertising, (ii) the sale of personal information, or (iii) profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.
- **Right to Non-Discrimination.** You have the right not to be discriminated against if you exercise any of these rights. Please note that a legitimate denial of a request to know or access, delete, correct, or opt out is not discriminatory, nor is charging a fee for excessive or repetitive consumer requests as permitted by the VCDPA.

Targeted Advertising:

We may participate in targeted advertising. You have the Right to Opt-Out of this advertising, as described above.

Appeal Process:

Virginia residents may submit an appeal for refusals to take action on your request by emailing Privacy@Staples.com with your name, email address, phone number and request id of the original request.

De-identified Data:

In instances where we de-identify your Personal Information to prevent it from being linked to you as an individual, we will maintain and use it in a de-identified format and will not attempt to re-identify the Personal Information.

To exercise the rights applicable to you, see instructions below in section **7.I. How to Exercise Your State-Specific Privacy Rights.**

As an additional resource, you may also contact us at Privacy@Staples.com for any additional questions related to the rights granted under the VCDPA.

j. California Residents

1. California Shine the Light Law

Under California Civil Code sections 1798.83–1798.84, California residents may request a notice disclosing the categories of personal information we have disclosed with third parties, for the third parties' direct marketing purposes, during the preceding calendar year. If you are a California resident and would like to make such a request, please see Section 8 below to contact us. Please allow 30 days for a response.

2. California Consumer Privacy Act of 2018 (CCPA)/California Privacy Rights Act of 2020 (CPRA)

This section applies to residents of California, in addition to all other non-state specific information contained in this Notice and sections 7.k. and 7.l. below.

California residents have the following rights under the CCPA/CPRA:

- **Right to Know and Access.** You have the right to confirm whether or not we are processing your personal information and to know what personal information the business has collected about you. While our table in section 7.h. below describes the personal information we collect about you, you have the right to make a request to know and get access to information that is specific to you, should we have any.
- **Right to Delete.** You have the right to request that we delete personal information we have collected from you or obtained about you, subject to certain exceptions. For example, we will not delete any personal information required to provide our existing services to you or that we must maintain to comply with our legal/financial obligations.
- **Right to Correct.** You may request that we correct inaccurate information we maintain about you, subject to some exceptions and, if necessary, independent verification.
- **Right to Opt-Out of the Sale/Sharing.** If we have sold or shared personal information about you, you have the right to opt out of the sale or sharing of that personal information.
- **Right to Non-Discrimination.** You have the right not to be discriminated against if you exercise any of these rights. Please note that a legitimate denial of a request to know or access, delete, correct, or opt out is not discriminatory, nor is charging a fee for excessive or repetitive consumer requests as permitted by the CCPA/CPRA.

To exercise the rights applicable to you, see instructions below in section **7.l. How to Exercise Your State-Specific Privacy Rights.**

Authorized Agent:

You may designate an authorized agent to exercise your rights under the CCPA/CPRA on your behalf. You must provide the authorized agent written permission to exercise your rights under the CCPA/CPRA on your behalf and we may deny a request from an agent on your behalf if we cannot verify that they have been authorized by you to act on your behalf. Even if you use an authorized agent to exercise your rights under the CCPA/CPRA on your behalf, pursuant to the CCPA/CPRA we may still require that you verify your own identity directly to us. This provision does not apply if you have provided a power of attorney under the California Probate Code.

Opt-Out Signal:

An opt-out preference signal may be sent by certain platforms, technologies, or mechanisms on your behalf to communicate your choice to opt out of the sale/sharing of your personal information. Opt-out preference signals will opt you out of the selling/sharing of personal information at the browser level.

Metrics:

The following section describes consumer rights submission metrics for requests we received from January 1, 2023 through December 31, 2023 for Company business units (not limited to California residents):

Disclosure Requests	Number of Requests Received	5
	Number of Requests Denied	0
	Number of Days to Resolve Requests (Mean)	44
	Number of Days to Resolve Requests with Extensions (Mean)	72
Deletion Requests	Number of Requests Received	205
	Number of Requests Denied Due to the Inability to Identify the Consumer with no Consumer Response to Follow Up Messages	2
	Number of Days to Resolve Requests (Mean)	29
	Number of Days to Resolve Requests with Extensions (Mean)	57
Do Not Sell or Share My Personal Information Requests	Number of Requests Received	845
	Number of Requests Denied	0
	Number of Days to Resolve Requests (Mean)	1
	Number of Days to Resolve Requests with Extensions (Mean)	N/A

Minors:

We do not knowingly share or sell the Personal Information of children under 16 years of age.

Notice of Financial Incentive:

We or our partners may provide price discounts, coupons, services, and other perks to our customers and for members of our loyalty programs. Through these offerings, you may provide us with Personal Information depending on how you choose to interact with us when and after you opt-in to our programs. There is no obligation to opt-in, and you may opt-out at any time. The details of the programs are contained in the program offerings. We offer these programs, among other things, to enhance our relationship with you so you can enjoy more of our products/services at a lower price. While we invest in our marketing and brands, consumer data is more valuable to our business when it is combined with a sufficient amount of other consumer data and after it is enhanced by our efforts described in this Privacy Notice. The value to our business of any individual consumer's data is dependent on several factors, including, for example, whether and to what extent you take advantage or opt out of any offerings and whether we are able to enhance the data through our efforts described in this Privacy Notice. While we do not calculate the value of consumer data in our accounting statements, we provide this good faith summary for California residents. To the extent we create overall business value from our programs that could be directly or reasonably related to the value of consumer

data, the method for calculating the value would include: a) costs related to maintaining the program including but not limited to IT infrastructure, delivery of offers, and marketing activities to enhance consumer data; b) whether the sales generated by the program exceeds the cost to us of offering the program including value of discounts to consumer; and c) value of the insights we are able to create based upon aggregate data.

Data Retention:

We retain all categories of your personal information for as long as is necessary, even if you are no longer an active customer, to provide the goods and services and to fulfill the transactions you have requested of us, and to support other necessary purposes such as:

- providing related business processes (such as returns or exchanges),
- resolving disputes and enforcing our agreements,
- fulfilling our legitimate interests (such as improving our products and services),
- responding to any questions, complaints or claims made by you or on your behalf,
- preventing fraud, and
- complying with our legal obligations.

In determining how long to retain information, we may consider various criteria such as the amount, nature and sensitivity of the information, and the potential risk of harm from unauthorized use or disclosure of the information.

The purposes and criteria for which we process the data may dictate different retention periods for the same types of information. For example, we retain your email address as an authentication credential (where applicable) as long as you have an account with us and an additional period of time after that for our legitimate interests and for our fraud and legal compliance purposes. We may also retain cached or archived copies of your information.

De-identified Data:

In instances where we de-identify your Personal Information to prevent it from being linked to you as an individual, we will maintain and use it in a de-identified format and will not attempt to re-identify the Personal Information.

Non-Discrimination:

We will not discriminate against you for exercising any of your CCPA/CPRA Rights and we will not deny you goods or services, charge you a different price, or provide you with a lesser quality of goods or services if you exercise any of your CCPA/CPRA Rights.

As an additional resource, you may also contact us at Privacy@Staples.com for any additional questions related to the rights granted under the CCPA/CPRA.

If you are a data controller with a consumer rights request for us, please contact us at Privacy@Staples.com.

k. State-Specific Disclosures About Handling Categories of Personal Information

For California, Colorado, Connecticut, Montana, Oregon, Texas, Utah, and Virginia residents, the following section describes:

1. Categories of Personal Information We Collect and Process
2. Examples of Specific Personal Information that may be Collected
3. Categories of Sources from which Personal Information is Collected
4. Purpose of Collecting/Processing the Personal Information
5. Categories of Other Parties to whom Personal Information may be Disclosed
6. Categories of Third Parties to whom Personal Information is Sold/Shared* and the Purpose of Sale/Sharing*

*Share/Shared/Sharing as defined by California, Colorado, Connecticut, Montana, Oregon, Texas, Utah, and Virginia law.

While this information is provided throughout this Privacy Policy, we provide the supplemental information below pursuant to requirements under these laws.

Not all categories or examples of specific Personal Information may be collected about you depending on how you interact with us.

Categories of Personal Information We Collect/Process	Examples of Specific Personal Information that may be Collected	Categories of Sources from which Personal Information is Collected	Purpose of Collecting/Processing Personal Information	Categories of Other Parties to whom Personal Information may be Disclosed	Categories of Third Parties to whom Personal Information is Sold/Shared and the Purpose of Sale/Sharing
Identifiers	Names, Account/Loyalty Program IDs, Emails, Addresses, Phone Numbers, IP Addresses, Other Device Identifiers, Tax Exempt Numbers, Driver's License	From You, Your Devices (when you visit our sites or use our apps), Service Providers (e.g., data brokers, fraud prevention companies), Business Partners, Social Networks	To identify you in support of business activities such as fulfilling a transaction, communicating with you (order notification, etc.), personalizing your experience, fraud prevention, administering programs	Advertising Networks and Service Providers/Business Partners/Business Clients such as cloud service providers, payment processing companies, fraud prevention companies, delivery companies, CA recycling partners, and product manufacturers	Advertising Networks for the purpose of Marketing and improving products and services
Commercial Information	Products or Services Purchased, Rewards Data, Price or Service Quotations, Credit Card or other Financial Information, Chat Sessions, Feedback/Survey Responses, Copy/Print Materials, Website	From You (when you transact with us or participate in any of our programs), or Business Partners with whom we have joint programs	To support a business transaction, communicating with you (surveys about your purchase, customer service, order notification, etc.), improve our products and services, to provide services you request of us	Advertising Networks and Service Providers/Business Partners/Business Clients such as cloud service providers, fraud prevention companies, payment processing companies, delivery	Advertising Networks for the purpose of Marketing and improving their products and services (We do not sell/share credit card data or other financial information.)

	Account Credentials, Communications Entrusted to Us			companies, and product manufacturers	
Biometrics	None	None	None	None	None
Characteristics of Protected Classifications	Demographic information such as age ranges, marital status, etc.	From You and Service Providers (e.g., data brokers, survey vendors, fraud prevention companies)	To protect against fraud, enable you to apply for a company credit card, demographically understand our customers to improve our products and services	Advertising Networks and Service Providers/Business Partners such as cloud service providers and marketing/sales analytics companies	None
Internet or Other Electronic Network Activity	Browsing activity, searches, IP address, and other interactions on our websites or mobile apps (such as text entered, pages visited, links clicked, keystrokes/cadence, and mouse movements), your interactions with our ads	From You, Your Devices (when you access our websites or mobile apps) and fraud prevention companies	To send marketing to you, personalize your experience, improve our products and services, fraud prevention, etc.	Advertising Networks and Service Providers/Business Partners/Business Clients such as cloud service providers, fraud prevention companies, and eCommerce analytics companies	Advertising Networks for the purpose of Marketing and improving products and services
Geolocation Data	Location based on IP address or mobile device location information	From You, Your Devices (when you access our websites or mobile apps), Service Providers (e.g., data analytics providers, fraud prevention companies)	To personalize your experience, display store locations near you, fulfill your orders, analyze web/app traffic, fraud prevention	Advertising Networks and Service Providers/Business Partners such as cloud service providers and eCommerce functionality vendors	None
Recordings/ Electronic Communications (e.g., audio, visual, chat, etc.)	Voice, Video, Email, Chat, and CCTV Recordings	From You (calls or emails with customer service or sales, or when you visit some of our locations), Service Providers (e.g., chat service providers, call recording software providers)	For quality assurance, training and analysis purposes, to improve our products and services, fraud prevention	Service Providers/Business Partners such as cloud service providers, customer service call recording companies chat/email quality assurance and fraud prevention service providers	None
Professional or Employment-Related Information	Employer Name and Job Title	From You (e.g., when you inquire about our programs), Service Providers (e.g., data brokers), Business Partners	To send you marketing, personalize your experience, enroll you in certain programs at your request	Advertising Networks and Service Providers/Business Partners such as cloud service providers and program administrators	None
Education Information	School Affiliations	From You (when you participate in certain programs)	To administer certain programs	Advertising Networks and Service Providers/Business Partners such as cloud service	None

				providers and program administrators	
Inferences	Product and Service Preferences	From You (when you tell us what products and service are of interest), by analyzing other data we have about you, Service Providers (e.g., advertising networks, fraud prevention companies), Social Networks	To provide you personalized experiences and marketing, group you into segments with other similar customers, improve our products and services	Advertising Networks and Service Providers/Business Partners such as cloud service providers and marketing/eCommerce analytics companies	None
Sensitive Personal Information*	Driver's License Number, Passport Number, Contents of Mail, Precise Geolocation	From you, postal mail that you requested we receive/process, your mobile device	To fulfill the services you requested of us	Returns Processing Vendor, Passport Processing Vendor, Mail Service Vendor, Store Locator Service	None

The above categories are intended to encompass the Personal Information described in subdivision (e) of Section 1798.80 of the California Civil Code.

*We do not collect, process, or share Sensitive Personal Information for the purpose of inferring characteristics about you.

I. How to Exercise your State-Specific Privacy Rights – for residents of California, Colorado, Connecticut, Utah, Virginia, and Montana (effective 10/1/24), Oregon (effective 7/1/24), Texas, (effective 7/1/24):

Residents may submit a Right to Know/Access request by either:

1. Submitting an online request here: [Data Disclosure Request](#)
2. Submitting a phone request by calling 1-800-333-3330

Residents may submit a Data Correction or Data Deletion request by either:

1. Submitting an online request here: [Data Correction/Deletion Request](#)
2. Submitting a phone request by calling 1-800-333-3330

Residents may submit a request to Opt-Out of Targeted Advertising, Selling/Sharing with Third Parties, or Profiling by either:

1. Submitting an online request here: [Do Not Sell/Share My Personal Information](#)
2. Clicking the “Do Not Sell/Share My Personal Information” link on our website

We will take reasonable steps to verify your above request prior to fulfilling it by requiring a response to a confirmation email sent to the email address on the request. For purposes of verifying your identity, we will request that you provide personal information we already have on file including your first and last name, email address, and phone number. We may also request mailing address and, if applicable, your account number, login ID for our websites, and rewards/loyalty number to ensure that we have a verified

match. We will respond to your request and let you know if we need additional information.

Authorized Agent:

In some states, you may designate an authorized agent to exercise your rights under your state's privacy law on your behalf. You must provide the authorized agent written permission to exercise your rights under your state's privacy law on your behalf and we may deny a request from an agent on your behalf if we cannot verify that they have been authorized by you to act on your behalf. Even if you use an authorized agent to exercise your rights under your state's privacy law on your behalf, pursuant to your state's privacy law we may still require that you verify your own identity directly to us.

m. International Residents

As residents of some international jurisdictions (such as the EU or UK), you will have certain additional rights with respect to your Personal Information under local laws (such as 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.
8. The right to restrict automated decision making and profiling.

To exercise any of these rights, please email Privacy@Staples.com and provide your name and the email address we would have associated with your account along with information pertaining to the right you wish to exercise. We will respond to your request within 30 days of receipt. We must verify your identity in order to honor your request.

Lawful Bases of Processing:

The laws in some jurisdictions require companies to tell you about the legal ground they rely on to use or disclose your "personal information" as such term is defined under applicable law. To the extent that such laws apply and where we are acting as a data controller that determines the purposes and means of processing your personal information, such as when we collect, use, and disclose personal information as described in the sections above, our lawful bases for processing personal information include:

- To conclude or perform a contract with you, for example to:
 - process your purchases of or requests for products and services, including delivering gift cards in accordance with your instructions.
 - communicate with you about orders, purchases, returns, services, accounts, programs, contests, and sweepstakes.
- For our legitimate business purposes, including to:
 - respond to your customer service inquiries and requests for information;
 - maintain, improve, and analyze our websites, mobile applications, ads, and the products and services we offer;
 - detect, prevent, or investigate security breaches or fraud; and
 - facilitate the functionality of our websites and mobile applications.

- To comply with our legal obligations, for example to maintain appropriate records for internal administrative purposes and as required by applicable law, and provide important product safety information and notice of product recalls; and
- On the basis of your consent, for example to send you via email and other electronic means personalized promotions and special offers or informing you about our brands, products, events, or other promotional purposes.

Data Retention:

We will retain your 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.

Complaints:

Some international jurisdictions give you the right to lodge a complaint if you have any concerns or questions. For example, EEA residents have the right to lodge a complaint with an EEA supervisory authority (https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm) and UK residents may lodge a complaint with the Information Commissioner's Office (<https://ico.org.uk/make-a-complaint/>). We would, however, appreciate the opportunity to first address your concerns and would welcome you directing an inquiry first to us per section 8 below.

n. Transmission of Information to/from Other Countries

If you are accessing our 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. We have taken commercially reasonable steps to ensure that your personal information is appropriately protected and is processed only in accordance with this Policy.

We may also use service providers in other countries. When you submit personal information to us, your personal information may be processed in a country where privacy laws are less stringent than the laws in your country.

8. 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: privacy@staples.com

Alternate contact by phone: 1-800-333-3330

or by writing to:
Staples, Inc.
Privacy and Compliance
500 Staples Drive
Framingham, MA 01702

Upon receiving a written request, we will contact you directly, investigate your request, and work to address your concerns. We reserve the right to take reasonable steps to verify your identity prior to granting access or processing changes or corrections.

9. 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:

V6.0	March 1, 2024	<ul style="list-style-type: none"> • Updated for MCDPA, OCPA, TDPSA • Updated general information and format • Updated the 2023 CCPA metrics
V5.0	July 1, 2023	<ul style="list-style-type: none"> • Updated for CPA, CTDPA, and UCPA • Updated general information and format
V4.0	January 1, 2023	<ul style="list-style-type: none"> • Updated for CCPA/CPRA and CDPA • Updated the 2022 CCPA metrics
V3.1	June 1, 2022	<ul style="list-style-type: none"> • Updated the 2021 CCPA metrics • Updated general information
V3.0	July 1, 2021	<ul style="list-style-type: none"> • Added 2020 CCPA metrics • Updated general information
V2.0	January 01, 2020	<ul style="list-style-type: none"> • Added California Consumer Privacy Act of 2018 (CCPA) rights. Expanded Canadian Residents section with information provided previously in a separate document. • 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. • Updated the Nevada resident opt-out instructions
V1.1	October 1, 2019	<ul style="list-style-type: none"> • Addition of language addressing the Nevada Data Privacy Law
V1.0	May 25, 2018	<ul style="list-style-type: none"> • Reorganization and Standardization of Privacy Policy and Introduction of the Privacy Resource Center
V0.1	March 23, 2017	<ul style="list-style-type: none"> • Removed references to the US-EU and US-Swiss Safe Harbor programs which have or will be discontinued.