

California Notice

Effective Date: September 1, 2024
Version 7.0

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

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 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 **How to Exercise Your 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.

Disclosures About Handling Categories of Personal Information

For California 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 law.

While this information is provided throughout the Privacy Notice, we provide the supplemental information below pursuant to requirements under the law.

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/Agencies and other Partners 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 Account Credentials, Communications Entrusted to Us	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 companies, and product manufacturers	Advertising Networks/Agencies and other Partners for the purpose of marketing and improving products and services (We do not sell/share credit card data or other financial information.)
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/Agencies and other Partners 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, Text Messages, Chat, and CCTV Recordings	From You (calls, text messages, 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, sales, 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 providers and program administrators	None
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
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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.

How to Exercise your Privacy Rights

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. In some instances, we may not be able to completely process your request if we do not receive all of the requested information from you. We will only use personal information provided in connection with the verification process to verify your identity or the authority of your authorized agent.

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/request directly to us.

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.