

Privacy at Staples

Customer Personal Information Privacy Policy (Effective Date: October 20, 2009)

At Staples your privacy is as important to us as it is to you. Our Customer Personal Information Privacy Policy defines how Staples protects your privacy. This *Privacy Policy* describes:

- Why we collect personal information
- What personal information we collect and when it is collected
- How your information is used and protected
- When and with whom your information is shared
- What to do if you feel your personal information has been compromised

This Privacy Policy applies to all of the services and websites offered by Staples, Inc., our subsidiaries, and affiliated companies. Staples offers many different websites for many different business purposes. As this Privacy Policy applies to all of our websites, they are collectively referred to as *Website* throughout this policy. The Website is also governed by its Terms of Use. If any of the terms of this Privacy Policy directly conflict with the Terms of Use, the terms of this Privacy Policy will apply.

If you have any questions about this Privacy Policy, please feel free to contact us through our Website or write to us at:

privacy@staples.com

OR

Privacy and Compliance
Staples
500 Staples Drive, Framingham, MA 01702, USA

Information We Collect

This Privacy Policy applies to *Personal Information*, which is information that Staples collects from you as a customer that specifically identifies you as an individual. This information is collected to provide you with the products and services you have requested as well as to provide a pleasant shopping experience now and to improve the shopping experience in the future.

While we limit the information we collect, we do collect Personal Information when you:

- Place an order from our catalogs or on our Website
- Create an account on our Website
- Make a purchase at one of our retail stores
- Return an item, make an exchange or submit a rebate
- Inquire about our products or services or contact customer service
- Request a catalog
- Receive a gift package
- Sign up for Staples email updates or other promotional materials
- Enter a contest or sweepstakes
- Are referred to us through a marketing promotion
- Participate in a marketing survey, promotion or event

- Apply for a Staples credit card account

In order to provide our full range of services, we may collect Personal Information including:

- Name
- Address
- Telephone number
- Fax number
- Email address
- Transaction information
- Credit card, debit card, or checking account information
- Driver's license number (in conjunction with merchandise returns)
- Age (in conjunction with promotions and for credit card applications)
- Social Security number (in conjunction with credit applications only)
- Employment history (in conjunction with credit applications only)

In order to provide you with a better shopping experience and to improve the quality of our services, we may combine the information you submit under your account with other information that we may receive from you, from third parties, or with other public demographic information. We maintain this information, along with a record of your purchases, in a restricted database.

There are some services provided by Staples that require us to become temporary custodians of your equipment that may contain your Personal Information. These services typically involve a personal computer. Staples does not retain information from these devices once the requested services are complete.

Also, our Website is not directed at collecting Personal Information from children and we do not actively collect Personal Information from children under the age of 13.

How We Use the Information We Collect

At Staples, we always want to provide you with the easiest and best possible shopping experience from the time you begin looking for products and services through the delivery of your requested items. The information that we collect lets us meet this goal by allowing us to:

- Customize your shopping experience
- Confirm, process and track your orders
- Provide the products and services you request
- Contact you with questions or status updates regarding an order
- Deliver merchandise and services that you purchase online
- Fulfill gift card orders
- Respond to your customer service inquiries or requests
- Identify your product and service preferences
- Communicate great values and featured items to you
- Send you catalogs or promotional offers we believe will be of interest to you
- Send you Staples email updates
- Improve our merchandise selection, Website, retail experience and customer service
- Provide information concerning product recalls or products you have purchased
- Prevent or mitigate fraud and credit risk
- Administer billing and payment for your purchases
- Administer promotions, contests, sweepstakes and rewards programs
- Administer branded credit cards

- Comply with applicable law, legal procedures, requirements, regulations and statutes

Staples does offer some of our services in connection with affiliated companies as well as other third parties. Third party websites may have different privacy practices than described in this Privacy Policy. We strongly encourage you to read the privacy policies associated with third party websites as this Privacy Policy applies only to the Staples Website, Staples' services, and Staples' handling of Personal Information.

Personal Information that you provide to third party websites may be sent to Staples in order to deliver the services you have requested. You can be assured that we will process Personal Information that we receive from these websites in accordance with this Privacy Policy.

Choices for Personal Information

To further improve your shopping experience, Staples partners with third party vendors to evaluate how the Website is used and to provide continuous improvement for our services. Like most websites, we use "cookies" for a variety of purposes to improve your visits to the Website. Cookies are pieces of information that a website transfers to the hard drive on your computer for record-keeping purposes. For example, we use cookies to understand which web pages are visited, how often they are visited, to remember you when you return to the Website, and to generally make the Website more user-friendly.

Most browsers are initially set up to accept cookies. You may decide to reset your browser to refuse all cookies or to notify you when a cookie is being sent. However, if you do decide to refuse all cookies please be aware that some Website features and Staples services may be unavailable or may not function properly.

To opt out of Staples advertising-related cookies, follow the links for our partners below:

- Coremetrics:
Opt-out: www.coremetrics.com/info_eluminate2.html
More information: <http://www.coremetrics.com/company/privacy.php>
- Doubleclick: http://www.doubleclick.com/com/us/about_doubleclick/privacy/

Choices for Receiving Promotional Material

You may also decide to opt-out of receiving promotional mail and/or email from Staples. Simply notify us of this decision by one of these methods:

- Follow the unsubscribe link on any promotional email received from Staples
- Send an email to us at support@orders.staples.com
- Call us toll-free at 1-800-333-3330
- Fax us toll-free at 1-877-490-2660
- Write to us at
Staples Direct Marketing Services
500 Staples Drive
Framingham, MA 01702.

Please note that any opt-out request sent via postal mail may take at least sixty (60) days to become effective. You may still receive email or postal mail from other affiliated companies and third parties if they have received your email or postal address from sources other than Staples or as a result of their own transactions or experiences with you. You will also continue to receive email or postal mail if you request to hear from us again at a later date.

Information Sharing

In the normal course of business Staples shares Personal Information with third parties. We do this in the following, limited circumstances:

- Personal Information is provided to our subsidiaries, affiliated companies or other third parties for the purpose of processing the information on our behalf. We require that these parties agree to process this information based on our instructions and requirements consistent with this Privacy Policy.
- We may disclose Personal Information as reasonably necessary to: (a) satisfy applicable law, regulation, legal process or enforceable governmental request, (b) enforce applicable Terms of Service, including investigation of potential violations thereof, (c) detect, prevent or otherwise address fraud, security or technical issues, or (d) protect against imminent harm to the rights, property or safety of Staples, its customers or the public as required or permitted by law.
- We may disclose a customer's name, phone number, postal address and/or ordering information to carefully selected third parties for marketing purposes so that they may notify individuals of offers or services that may be of interest. We do not provide credit card or other financial information for marketing purposes.
- We may share with third parties certain pieces of aggregated, non-Personal Information, such as how many customers viewed a particular product or web page. Such information would not identify you individually.
- We may disclose and/or transfer Personal Information to a third party in connection with a merger, acquisition, or sale (including any transfers made as part of insolvency or bankruptcy proceedings) involving Staples or its affiliated companies or as part of a corporate reorganization, stock or asset sale, or other change in corporate control.

Information Security

Staples processes Personal Information for the purposes for which it was collected. The information is processed in accordance with this Privacy Policy, any additional privacy notices that may be associated with the service we are supplying, applicable law, or your authorization or consent.

Staples maintains reasonable and appropriate standards to safeguard your Personal Information. When you enter Personal Information that contains a Social Security Number, driver's license number, or credit or debit card number at the designated and secured sections of our Website, the information will be encrypted or encoded before it is sent over the Internet. Personal Information that we collect and maintain is subject to physical, administrative and technical controls that are consistent with recognized industry standards.

Staples processes Personal Information on our servers in the United States of America and in other countries. In some cases, we may process your Personal Information on a server outside your own country in accordance with this Privacy Policy and applicable law.

Data Integrity

Staples takes reasonable steps to verify that the Personal Information we store and process is accurate, complete and current. We also depend on our customers to update or correct their online profiles and to contact us with changes in Personal Information whenever necessary by one of the following means:

- Send an email to us at support@orders.staples.com
- Call us toll-free at 1-800-333-3330
- Fax us toll-free at 1-877-490-2660

- Write to us at
Staples Direct Marketing Services
500 Staples Drive
Framingham, MA 01702.

Unless otherwise required by law or for legitimate business purposes, we will make good faith efforts to correct or delete such data at your request when you notify us of an error or change in your Personal Information. To prevent unauthorized changes to someone's Personal Information, we ask individual customers to positively identify themselves before processing such requests.

We reserve the right to charge a small fee to process any request to update, correct or delete Personal Information. We also may decline to process requests that require a disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup tapes).

Policy Enforcement

Staples regularly reviews its compliance with this Privacy Policy. Please feel free to direct any questions or concerns regarding this Privacy Policy or Staples' treatment of Personal Information to us through the Website or by writing to us at the email or postal mail address contained at the beginning of this document.

If we receive a written complaint, it is Staples' policy to contact the complaining customer regarding his or her concerns. We will investigate complaints promptly and diligently to address your concerns and resolve any dispute quickly.

We are also a member of BBBOnLine, the online division of the Better Business Bureau, which offers a privacy dispute resolution program for customers with online privacy complaints involving BBBOnLine privacy program participants. We will strive to resolve any customer service complaints regarding the transfer of Personal Information that cannot be resolved between Staples and the customer promptly in accordance with BBBOnLine procedures.

What to do if you believe someone has improperly used your personal data

If you believe that someone has improperly accessed or used your personally identifiable information supplied to Staples or has made purchases at Staples that you did not authorize, please contact us immediately

Here are some additional things that you can do to protect yourself from identity theft if you think that your Personal Information has been compromised:

- Review Your Account Statements – Carefully review your bank, credit card, and other account statements every month to ensure that all of your account activity is valid. Report any questionable charges promptly and in writing to the card or account issuer.
- Check Your Credit Report – Check your credit report periodically to ensure that all your information is correct. You can obtain a free credit report once per year by visiting www.annualcreditreport.com or by calling 877-322-8228. Carefully reviewing your credit report can help you spot problems and address them quickly. If you have any questions about your credit report or notice any inaccuracies, contact the relevant consumer reporting agency promptly at the telephone number listed on the report.
- Fraud Alert – Consider placing a fraud alert on your credit file. The fraud alert requests that creditors contact you before opening any new accounts or increasing credit limits on your existing accounts. You can place a fraud alert on your credit file by contacting one of three consumer

reporting agencies listed below. You need to contact only one of the three agencies; the one you contact is required by law to contact the other two. You will receive confirmation letters in the mail and then will be able to order a credit report from each of the three agencies, free of charge. The fraud alert will remain in your credit file for at least 90 days.

Equifax	Experian	TransUnion
P.O. Box 740241	P.O. Box 9532	P.O. Box 6790
Atlanta, GA 30374	Allen, TX 75013	Fullerton, CA 92834
800-525-6285	888-397-3742	800-680-7289
www.equifax.com	www.experian.com	www.transunion.com

- Consult the Federal Trade Commission. For more guidance on steps you can take to protect your information, you also can contact the Federal Trade Commission at www.ftc.gov/idtheft, or at 877-ID-THEFT (877-438-4338), or at the Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue NW, Washington, D.C. 20580.

International Considerations and Safe Harbor

Staples is registered with the U.S. Department of Commerce's Safe Harbor Program and adheres to the US Safe Harbor Privacy Principles of Notice, Choice, Onward Transfer, Security, Data Integrity, Access and Enforcement.

(For California Residents) Privacy Rights under California Civil Code Sections 1798.83-1798.84

California Civil Code sections 1798.83-1798.84 give California residents the right to ask us for a notice describing the categories of Personal Information we share with affiliated companies or third parties for their direct marketing purposes. The notice will identify the categories of information shared and will include a list of the third parties and affiliates with which it has been shared, along with their names and addresses. Please allow 30 days for a response. If you are a California resident and would like a copy of this notice, please submit a written request to the email or postal mail address contained at the beginning of this document.

Changes to this Privacy Policy

Please note that this Privacy Policy may change from time to time. We will post any Privacy Policy changes on this page and, if the changes are significant, we will provide a more prominent notice. Each version of this Privacy Policy will be identified by its effective date found at the top of this document.

If you have any additional questions or concerns about this Privacy Policy, please feel free to contact us any time through this web site or at the email or postal mail address contained at the beginning of this document.