

## WORKFORCE CALIFORNIA NOTICE

V4.0

Effective Date: June 1, 2024

### California Residents

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

In addition to all other non-state specific information contained in this Notice, this section applies to residents of California.

The following table describes:

1. Categories of Personal Information We Collect
2. Examples of Specific Personal Information that may be Collected
3. Categories of Sources from which Personal Information is Collected
4. Examples of Purposes for Collecting the Personal Information
5. Examples of Categories of Service Providers to whom Personal Information may be Disclosed

Not all categories or examples of specific Personal Information may be collected about you depending on how you interact with us, your work location, your job responsibilities, etc.

Categories of Personal Information We Collect	Examples of Specific Personal Information that may be Collected	Categories of Sources from which Personal Information is Collected	Examples of Purposes for Collecting the Personal Information	Examples of Categories of Service Providers to whom Personal Information may be Disclosed
Identifiers	Full Name, SSN, Driver's License Number, Banking Information, Birth Date, Passport, Birth Certification, Personal Contact Information (such as Address, Email Address, Telephone Numbers), Employee ID, Staples Contact Information	From You and our Service Providers (e.g., benefits providers or recruiting agencies)	To Uniquely Identify an Individual in Support of Business Activities and for Employment Authorization	Benefits Providers Business Software and Service Support Vendors Security Support Vendors Government Agencies for Employment Reporting Workforce Survey/Talent Management Vendors
Commercial Information	Timesheet/Mileage Data, Perks Activity, Company Purchases in your Employment Role, Travel Records, Sweepstakes/Survey/Contest Submissions	From You and our Service Providers (in support of business processes or when you participate in any of our programs)	To Understand Participation in Company Programs and In Support of Business Activities such as Expense Reporting, Procurement Activities, Company Travel, etc.	Payroll Vendors Program Service Providers Travel Administration Vendor Safety and Emergency Service Vendors
Biometrics	Facial Template used for Facial Recognition in some Facilities or for Identity Verification in some Cybersecurity Processes	From You and our Service Providers (e.g., facility security or cybersecurity vendor)	For Security, Access Control, Password Resets, and in Support of Business Compliance/Activities	Digital Identity, Cybersecurity, and Facility Security Service Providers
Characteristics of Protected Classifications	Demographic information such as age ranges, marital status, etc.	From You and our Service Providers (e.g., wellness program or benefit providers)	For Benefit Program Management and in support of Inclusion/Diversity Programs	Benefits Providers Wellness Program Providers Workforce Survey/Talent Management Vendors

Internet or Other Electronic Network Activity	IP Address, Internet/System/Application Activity Logs, Badge Logs, Browsing History	From You, Your Devices (when you access our network) and our Service Providers (e.g., network security vendors)	For Security and Fraud Detection and In Support of Business Compliance/Activities such as Firewall Enforcement and Office Location Usage	Network Service Providers Security Service Providers Business Software and Service Support Vendors
Geolocation Data	Device Longitude and Latitude, IP Address Correlations, Mobile Phone Geolocation	From You, Your Devices (when you access our websites or mobile apps), and our Service Providers (e.g., fraud prevention companies, mileage tracking application vendors, safety/emergency service vendors, etc.)	For Security and Fraud Detection and In Support of Business Compliance/Activities such as Mileage Reimbursement and Emergency Service Applications	Network Service Providers Security Service Providers Fraud Prevention Service Providers
Recordings/Electronic Communications (e.g., audio, visual, chat, etc.)	Voice or Chat Recordings, CCTV Recordings, Dash Cam Interior/Exterior Video, Photographs, Online Meeting Recordings	From You (when you call the Help Center or when you visit some of our facilities), Your Device (when you participate in an online meeting), and our Service Providers (e.g., driver safety vendor, call recording software providers, etc.)	For Security/Safety Purposes, Quality Assurance Programs, Training, and in Support of Business Compliance/Activities such as Firewall Enforcement	
Professional or Employment-Related Information	Employment History, Job Title, Performance Reviews, Resume, Career Assessments, Background Checks, Work Eligibility Evidence, Work Permit Application/Status	From You (e.g., when you apply for a job) and our Service Providers (e.g., recruiting agencies)	For Employment Evaluation, Onboarding, Talent Management and In Support of Human Resource Compliance/Activities	Human Resource and Talent Management Service Providers Government Agencies for Employment Reporting
Education Information	Education History including Transcripts, Schools Attended, Degrees, and Certifications	From You (e.g., when you apply for a job) and our Service Providers (e.g., recruiting agencies)	For Employment Evaluation, Onboarding, Talent Management, and In Support of Business Activities such as Meeting Education/Certification Requirements	Human Resource and Talent Management Service Providers
Inferences	Leadership Style/Qualities, Professional Interests	Internal Colleagues/Supervisors and our Service Providers (e.g., consulting services, leadership survey administrators, etc.)	For Succession Planning, Talent Management and In Support of Business Activities such as Business Continuity	Talent Management Service Providers
Sensitive Personal Information*	Race, Ethnicity, Precise Geolocation	From You and Your Devices (e.g., when using applications to track mileage or interact with emergency services)	To Support Inclusion and Diversity Programs, Mileage Reimbursement Processing, Provide Emergency/Safety Services, etc.	Workforce Survey Management Vendors I&D Consulting Services Vendors

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 or process Sensitive Personal Information for the purpose of inferring characteristics about you.

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 the table above 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.

California residents may submit your request to Know/Access, Delete, Correct, Opt-Out of the Sale/Sharing of your Personal Information by:

1. Submitting an online request here: [California Workforce Privacy Rights Request](#)
2. Submitting a phone request by calling 1-888-490-4747

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, but not limited to, your name, email address, and phone number. We may also request other verification information, such as your employee ID and term of employment. We will respond to your request and let you know if we need additional information.

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 California Residents between January 1, 2023 through December 31, 2023 for Company business units:

Disclosure Requests	Number of Requests Received	1
	Number of Requests Denied	0
	Number of Days to Resolve Requests (Mean)	-
	Number of Days to Resolve Requests with Extensions (Median)	55
Deletion Requests	Number of Requests Received	3
	Number of Requests Denied	0
	Number of Days to Resolve Requests (Median)	4
	Number of Days to Resolve Requests with Extensions (Median)	-
Do Not Sell or Share My Personal Information Requests	Number of Requests Received	2
	Number of Requests Denied	0
	Number of Days to Resolve Requests (Median)	5
	Number of Days to Resolve Requests with Extensions (Median)	-

**Minors:**

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

**Notice of Financial Incentive:**

We may provide price discounts, coupons, services, and other perks to our workforce and for members of our wellness 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. 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 Workforce member, to provide the services and to fulfill the transactions you have requested of us, and to support other necessary purposes such as:

- providing related business processes,
- resolving disputes and enforcing our agreements,
- fulfilling our legitimate interests (such as improving our processes 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.

#### 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](mailto: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](mailto:Privacy@Staples.com).