

**Privacy Statement Staples  
Staples Sweden**

## 1. Introduction

When you make use of the Staples.se, Staplesadvantage.se, Staplesnetshop.se, brandstore.net, Staplesbrandpartner.se and Brandpartner.se websites, Staples Sweden processes personal data. We will use your personal data legitimately and responsibly in line with applicable privacy laws and regulations.

In this Privacy Statement, we describe who we are, how and for which purposes we process your personal data within Staples Sweden, how you can exercise your privacy rights, and all other information that may be relevant to you.

We did our best to provide you with all information in a clear and readable format. However, if you have any questions about our use of your personal data after reading this Privacy Statement, you can always contact us through the contact details provided below.

Finally, we would like to point out that we are continually developing and improving Staples Sweden. If this brings about any changes in the way we process personal data, this will be reflected in this Privacy Statement. We therefore recommend that you regularly take notice of the Privacy Statement for any modifications. At the bottom of this Privacy Statement you can read when this Privacy Statement was last modified.

## 2. Who are we?

Staples Sweden is the data controller for Staples Sweden activities. Our contact details are: Box 1777, 501 17 Borås. If you want to contact Staples Sweden, please use the contact details provided at the bottom of this Privacy Statement.

Our data protection officer is: Rafal Jacyński. The DPO office can be contacted via: [privacy@staples-solutions.com](mailto:privacy@staples-solutions.com).

### 3. For which purposes do we process your personal data?

Staples Sweden processes your personal data for the following purposes:

**Order management and performance of a contract** – We process your personal data to prepare, receive and carry out the purchase agreement(s) as agreed upon.

**Back office activities** – We process your personal data for administrative and financial business activities, such as reporting and the managing and processing of invoices and collections.

**Communication, marketing and loyalty program purposes** – We process your personal data for the purposes of customer service and support, to manage our relationship with you, to carry out marketing activities, to make (personalized) offers, to include you in our loyalty program, and/or to provide and share information about our services.

**Legal purposes** – We process your personal data for identification purposes, to counter fraud, to perform audits, to initiate legal action, to secure safety within the company and to comply with legal obligations.

Are you looking for more detailed information on how we process your personal data? Just keep reading!

#### **Order management and performance of a contract**

- Whenever you place an order with Staples Sweden, we are required to collect and process your personal data to carry out and deliver your order while keeping you updated on its delivery status and, where necessary, to manage returns. To that end, we require the contact details from you and/or your organization, depending on the order.

We may disclose your personal data to third parties to ensure that your order is delivered. Your personal data may be shared with carrier companies to be able to send you the correct packages or to pick up returns.

In case of an order which uses electronic payment, your order may be processed by a payment service provider. In that case, the payment service provider is responsible for the processing of your payment

*Legal basis: Performance of a contract*

## **Back office activities**

- **Invoices and collections management** – After an order has been placed and the product is being or has been delivered, Staples Sweden will send an invoice detailing the amount to be paid. Staples Sweden also processes personal data to keep track of outstanding debtors with open or unpaid invoices. Customers with unpaid invoices will be included in the dunning process and will be sent frequent reminders. To this purpose, personal data such as contact details, order details and company details will be processed.

*Legal basis: Legitimate interest*

## **Communication, marketing and loyalty program purposes**

- **Customer relationship management** – Your relationship with Staples Sweden is important to us and as such, we take the utmost care to ensure that your personal data is accurate and up-to-date. Customer relationship management includes the contact creation and registration of your account as a Staples Sweden customer. It also includes facilitating the sharing of your contact information within Staples Sweden to draft order proposals and send invoices to the right customer. To that end, we collect your contact details.

*Legal basis: Performance of a contract, legitimate interest*

- **Customer service and support** – We want to be able to help you as quickly as possible whenever you contact us for support or want to file a complaint. In order to do that, we need to process your personal data in the form of taking notes and registering both chat and telephone conversations that you have with our representatives. We use this information not only to facilitate the resolution of your query but also to analyse and improve our services. To that end, we collect your contact details and your complaint. In select cases,

the substantive content of your complaint may be stored for coaching purposes only.

In the event that a product, purchased from Staples Sweden, is faulty or you are not satisfied, we can engage with third parties to carry out repairs or to handle other service requests. Service requests received by Staples Sweden may be handled through its vendors and the personal data shared with these parties is limited to the personal data that is strictly necessary.

*Legal basis: Performance of a contract*

- **Marketing and promotional offerings** – Are you already a customer of Staples Sweden or have you indicated that you want to receive our promotional offerings? Existing customers can be included in a mailing list through which printed (or digital) catalogues, flyers and/or brochures are offered and sent. In order to send these offerings, we process your contact details and company details.

*Legal basis: Consent, legitimate interest*

- **Loyalty program participation** – We may also process your personal data if you indicate that you want to participate in the Staples Sweden loyalty program to receive personalized offerings and provide feedback through customer satisfaction and/or interest surveys. To that end, Staples Sweden collects your contact details and account details.

*Legal basis: Consent*

## **Legal purposes**

- Customer data may be needed to investigate, prevent and resolve instances of fraud. We may also be obligated to hand over your personal data to public authorities (such as the police or tax authority) whenever this proves necessary to comply with our legal obligations.

Also, where a customer refuses to settle its unpaid invoice(s), Staples Sweden may forward the customer contact details to its legal counsel to take

the necessary legal action to ensure payment.

*Legal basis: Legal obligation*

#### 4. Which personal data do we collect about you?

We collect several categories of personal data when you make use of Staples Sweden:

- **Contact details** (name, address (including city and postal code), place of residence, e-mail, telephone number, fax number, etc.)
- **Company details** (address, Chamber of Commerce number, VAT number, etc.)
- **Account details** (username, password, customer ID, etc.)
- **Order details** (date and item of purchase, order status, order amount, order price, payment details, financial details, etc.)
- **Marketing and Communication details** (whether you have opted out for direct marketing, creation of mailing lists, social media details, geographic details, sending of promotional offerings, etc.)
- **Participation details** (whether you participate in promotions or loyalty programs)
- **Customer service details** (contact with our customer service or digital and/or written correspondence)
- **Web details** (cookies, etc.)

Staples Sweden collects the following personal data directly from you:

- Personal data that you share when you create an account and/or other data you have disclosed when using the Staples Sweden Environment (contact details, company details)
- Personal data you share when ordering a product or service via Staples (order details)
- Personal data that you provide us through correspondence, feedback, customer service support and dispute resolution (contact details and any other personal data you provide to Staples Sweden)
- Data about how you use our website collected through cookies (analytics) and data about your surfing behaviour

Staples Sweden collects the following personal data about you from other sources:

- Contact and business details that you have shared with third parties;
- Company details that you have shared with third parties;
- Account details that you have shared with third parties.

## 5. On which legal ground do we base the processing of your personal data?

To be lawful, each processing of personal data has to be based on a so called 'legal ground' as listed in the EU General Data Protection Regulation. We process personal data associated with Staples Sweden based on four legal grounds;

- (1) for the performance of a (service) contract with you; or
- (2) for compliance with a legal obligation; or
- (3) for legitimate interests pursued by us; or
- (4) your consent

### **Performance of a contract**

We use your personal data for processing necessary for performance of the service contract with you. Without these data, we would not be able to fulfil our side of the contract. The processing of orders and service requests falls under this legal ground.

### **Legal obligation**

We are legally obliged to process your personal data in order to comply with fiscal and other legal obligations.

### **Legitimate interest**

We use your personal data for our legitimate interests.

- to be able to maintain a lasting relationship with you as a customer and to offer you products and services (e.g. direct marketing).
- to be able to detect fraud and security incidents on our website.
- to defend ourselves in legal proceedings.
- to improve the effectiveness of our service through statistical analysis

We may use personal data in a personal, pseudonymous form to understand how we can develop and improve the service, as well as for reporting purposes, general statistical and analytical purposes. When circumstances make this necessary we may process personal data for fraud investigation or to fulfil legal obligations.

Processing personal data for these purposes serves a legitimate business interest of ours.

## **Consent**

In those cases where the previous three legal grounds do not apply, we process data with your unambiguous consent.

Note that you can always withdraw your given consent. Under the headline '*Can you withdraw your given consent later on?*' you can read how to do so.

## **6. To whom do we provide your personal data?**

We can provide your personal data to third parties in accordance with this Privacy Statement and in so far as permitted by law. Without your consent, we will not provide your personal data to recipients for their own marketing purposes.

Your personal data can be received by the following categories of recipients:

### **Internal Departments and Group companies**

We may share personal data internally with other departments (such as Accounts Receivable) and with other entities of Staples Solutions (such as Staples Norway and Staples Denmark) for the purpose of providing you with information, products and/or services (such as registration and customer support), the development of new products, websites, applications, services, promotions and communication, and to prevent, trace and examine possible illegal activities, infringements of our policies, fraud and/or breaches of our data security.

### **Authorities**

We may provide your personal data to supervisory authorities such as Tax and Customs Administration, the police and other statutory bodies. We provide your personal data:

- To comply with a statutory obligation or court order; or
- If this is necessary to prevent, trace or prosecute criminal acts; or
- If this is necessary to enforce our policies, or to protect the rights and freedoms of others.

**Business service companies (data processors)**

We make use of business service companies to help us execute our business. These organizations act only on our instructions and are contractually bound by us not to use your data for their own purposes.

**Payment service providers**

When you purchase a service/product, you will also receive a request to provide your payment details. Those personal data may be collected and processed directly by the payment service provider. This provider is responsible for processing your payment details within the limits set by law.

**Other**

In certain cases, we may provide your personal data to third parties. We refer specifically to third parties which belong to the Staples Group or parties which will be part of the Staples Group and/or its legal successor as a result of a restructuring, merger or acquisition.

**7. Are your personal data being transferred outside of the European Union / European Economic Area?**

Your personal data are not being transferred outside of the European Union / European Economic Area.

**8. How do we store your personal data?**

Your personal data will be removed or made anonymous when your personal data is no longer necessary for the purposes set out in this privacy statement.

There are instances where certain elements of your personal data are stored for a longer period of time due to certain legal obligations set out by public institutions. We may also store elements of your personal data for our own legitimate interest, such as detecting fraud, handling potential disputes, or facilitating our contractual arrangements with third parties such as vendors.

**9. How can you exercise your privacy rights (data subject rights)?**

At every desired moment, you can request to access, rectify or erase your personal data or you can object to direct marketing and profiling. In addition to this, you may

also have the right of restriction of processing concerning your personal data, the right to object to processing as well as the right to data portability. These rights are known as your 'data subject rights'.

To invoke your data subject rights, please contact us by using the contact details at the bottom of this Privacy Statement.

Please keep in mind that we may ask for additional information to verify your identity.

If you no longer want to receive direct marketing communication, please contact us by using the contact details at the bottom of this Privacy Statement.

## **10. Can you withdraw your consent?**

Once given, you may always withdraw your consent. Please keep in mind that withdrawal does not have retrospective effect.

You can withdraw your consent for commercial communications using the unsubscribe link in the last communication you received.

If you want to withdraw your consent for other processing activities, please contact us by using the contact details at the bottom of this Privacy Statement.

## **11. Can you lodge a complaint?**

You can lodge a complaint with us via the contact details at the bottom of this Privacy Statement. Furthermore, you can lodge a complaint with the Swedish data protection supervisory authority, Datainspektionen.

## **12. How can I contact Staples Sweden?**

If you have any questions about the way we process your personal data that are not answered by this privacy statement, please contact us via [dpo.nordic@staples-solutions.com](mailto:dpo.nordic@staples-solutions.com)

To contact our Data Protection Officer, send your question or complaint to our data protection: Rafal Jaczynski. The DPO office can be contacted via: [privacy@staples-solutions.com](mailto:privacy@staples-solutions.com).

### **13. When was the last modification made to this Privacy Statement?**

This Privacy Statement applies since 24/05/2018. The last modifications to this Privacy Statement were made on 24/05/2018.