

Grimsby Public Library – Privacy Policy

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September 11, 2019

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September 11, 2019

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June, 2021

Notes:

Approved June 15, 2011

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Purpose

All users of the Grimsby Public Library have the right to privacy and confidentiality regarding their use of the library's services, programs and collections. This policy outlines the information collected, conditions and exceptions and retention of information.

Guidelines

All information collected from individuals under the authority of the Public Libraries Act, is subject to the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA). Under these acts, all users of the Grimsby Public Library have the right to privacy and confidentiality regarding their use of the library's services, programs and collections. Customer borrowing and electronic use records are held in confidence by the Library and are accessed only for the purposes identified at the point of collection.

Collection of Personal Information

The Grimsby Public Library collects personal information under the authority of the Municipal Freedom of Information and Protection of Privacy Act for the purpose of conducting the library's business, which may include fines, holds, overdue notices, fundraising and programs.

Personal information is defined as recorded information about an identifiable individual. For the Library's purposes, that information includes:

- Name, address, telephone number, date of birth and e-mail address (if applicable)
- The name of the parent or legal guardian of all children up to age 16 without appropriate identification of their own.
- Borrowed materials
- Overdue fines and other charges
- Holds/requests for materials
- Information related to registration for Library programs
- Information related to volunteer application forms
- Information related to sponsors, benefactors and donors
- Information related to recruitment

Library patrons can see personal information about themselves upon request. Only parents or legal guardians, who are listed as the responsible person for the child, may obtain information about their child's account until they turn 16 years old.

Date of Birth identifies patrons with similar/same names and allows us to update borrower records from "child", to "teen" to "adult".

The Library collects images and video clips through security cameras. Images are only used to ensure the security and safety of collections, staff and individuals using the library.

The Library collects photos of Library users at Library events and programs. Photos/video of recognizable individuals taken by Library staff or for Library purposes will not be used without prior permission. The Library is not responsible for any third party reuse or reposting of photos/video taken at Library programs and events.

In keeping with Canadian Anti-Spam Legislation (CASL), email addresses are used solely for the intended purpose, for which the patron has provided explicit consent, and will not be shared with any other individual or organization.

Retention of User Information

Personal information about the identity of Library customers is collected voluntarily and is stored electronically in a database. The Library also records current transactions which identify use of the Library by a specific individual. This transaction information is temporary and is deleted once a given transaction or use is deemed complete. An exception is made for authorized uses, such as tracking use data for shut-in patrons served by our Visiting Library Service. The Library makes some additional exceptions on an individual basis for patrons at their request. Library program registration information is kept in paper format and shredded following the start of the next session of that program. Information about the is not kept once the material is returned to the library unless it is overdue, incomplete or damaged or the patron has opted to make use of the Reading List option through the Library's online catalogue.

Disposal:

If used during the membership application process, completed membership forms are shredded once they are input into the Library system. Personal information that is recorded to register for a library program is destroyed by shredding following the event or program. Borrower accounts are deleted from the database after 5 years of inactivity as long as there are no outstanding items and/or fees.

Access to Personal Information

Access to customer information is limited to:

- Library employees and authorized volunteers, working within the scope of their duties
- The individual to whom the information relates, or, if the individual is less than 16 years of age, the person who has lawful custody of that individual. Access by an individual requires proof of identity.

Personal information held by the Library, including customer borrowing and electronic use records, will not be divulged to a third party (including spouses), except in very specific permissible circumstances, including:

- The custodial parent or guardian of an individual who is less than 16 years of age.
- Someone holding Power of Attorney for a specified individual, where proof of the Power of Attorney is provided.
- A law enforcement agency requesting specific personal information, where the request is supported by a formal warrant or otherwise required by the law.

Customers should report immediately any lost or stolen library cards to reduce the potential of unauthorized access to their records and protect their information.

If you bring a library card; overdue notice or collection letter that belongs to another person, it implies consent for you to pick up material on hold for that person or pay that person's fines. It does not allow you to have access to other information in that person's record.

The Library and Library users have the right to request a correction of personal information if erroneous data is identified. The Library has a right to request supporting documentation from a customer when making any corrections. Customers are responsible for identifying changes in personal information such as name, address or contact information to maintain the accuracy of their information.

Online Privacy:

The use of the Library's online catalogue does not require the provision of any personal information unless account access is required. Customers can access their personal library account with their library card number and password through the online catalogue. Personal account information can include name, address, telephone, e-mail as well as items checked, on hold and fines/fees. Verification of the library card number and password is done through the automated library's patron database.

The online catalogue is programmed to close after a short period to prevent access to personal information by other customers. However, it is advisable to logout when finished with the online catalogue.

Customers using commercial databases through the Grimsby Public Library website are required to enter their library card number to access the databases. The library card number is verified against the automated library's patron database. A log of this verification remains on the database server for a short time and is automatically purged.

Links to websites of other organizations are included on the Grimsby Public Library's website. These links are provided for information only and are not subject to the privacy policy of the Grimsby Public Library. Users are urged to consult the privacy policies of the specific websites before providing any personal information.

Computer Workstations

Customers wishing to use the Grimsby Public Library's computer workstations must use the PC Reservation software package. This software records the name, the user keys in when they log on. This data is stored in a log file which is purged every six months.

GPL attempts to remove any personal files stored on the hard drive at the end of the session, however, with Cloud computing this cannot be 100% guaranteed. All computer workstations are located in a public environment and the Library cannot guarantee privacy when using them. Any documents or images displayed on the workstations may be viewed by other members of the public. Customers must log off from the workstation at the end of their session.

Wireless Internet

The wireless network provided by the Grimsby Public Library is an open, unsecured network and the Library cannot guarantee the security of the customer's computer (or content) while using it.

Electronic Communication

Customers may use e-mail to contact library staff. This communication may include the e-mail address, name, postal address, library card number and specific reference request. This communication can only be accessed by authorized members of the library staff and will be stored in their mail account until deleted. Polls or surveys may be featured on the Grimsby Public Library webpage to gauge public opinion. No identifiable

data will be collected and any information collected will be used to improve Library collections, programs and services.

Access Requests

All Grimsby Public Library customers have the right to access their personal information as well as information regarding library operations. The request may be submitted on an informal or formal basis, depending on the nature of the request. Any requests are subject to the exemptions outlined in the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA).

Informal Requests

Customers must provide appropriate identification before personal information will be provided. For example, upon presentation of their library card or other approved identification, a customer may query their records and/or the records of their minor age children or wards. Library staff may assist customers if required.

Formal Requests

Information from the Library's database files shall only be released to the police or government agencies upon the presentation of a proper and valid warrant. In the absence of a warrant the information requested must be in accordance with Section 32(g) and 32(i) of the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) In such cases, the senior staff member on duty has the authority to release personal information to the police or government agencies in Canada to aid an investigation leading or likely to lead to a law enforcement proceeding or in compassionate circumstances to facilitate contact with next of kin of an individual who is injured or deceased. All such requests must be documented on the Grimsby Public Library's Disclosure of Personal Information form created for this purpose.

All other formal requests for personal or operational information must be done in writing. Requests by written letter must include the following information:

- Full name and mailing address
- Daytime telephone number
- Detailed information regarding the requested records; including specific files, dates and other pertinent information

All formal requests must be addressed to the Grimsby Public Library C.E.O./Chief Librarian, who serves as the Freedom of Information Coordinator. Each request will be reviewed to determine if the Library will release the requested information. Written notice by the C.E.O. will be provided to the individual or group submitting any request.

The C.E.O./Freedom of Information Coordinator can be contacted at:
Office of the CEO and Chief Librarian
Grimsby Public Library,
18 Carnegie Lane

Grimsby, Ontario
L3M 1Y1
Telephone: 905-945-5142
E-mail: gen-library@grimsby.ca

Contravention of Policy

The Grimsby Public Library Board reserves the right to remove the privileges of any Library user found in contravention of the Grimsby Public Library Board's policies.

Appendix A

Disclosure of Personal Information form

Request from _____ (insert Police Force) for Access to Personal Information held by the Grimsby Public Library for the purposes of law enforcement as defined by the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)

In accordance with the provisions of MFIPPA sections 32 (g) and (i) respecting permitted disclosure of personal information to aid in investigation undertaken with a view to a law enforcement proceeding, or from which a law enforcement proceeding is likely to result; in compassionate circumstances, to facilitate contact with the spouse, a close relative or a friend of an individual who is injured, ill or deceased, access to the following records is requested:

Section 1:

Employee or Patron Name: (please check one)

Description of Information Requested:

Section 2: To be completed by Police Officer(s)

Occurrence Number:

Review Original/Digital Documents Copies Requested Original Requested*

*Originals are released only upon receipt of a subpoena. Copy of file/record must be retained by Library.

Signature of Investigating Officers	Name (please print)	Badge/ID Number	Date
Signature of Investigating Officers	Name (please print)	Badge/ID Number	Date

Section 3: To be completed by Library Staff

The personal information held by the Grimsby Public Library has been released in accordance with the provisions allowing disclosure of information outside the institution pursuant to section 32 of the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA).

Please indicate the circumstances under which disclosure was authorized and included any related comments below:

- (g) If disclosure is to an institution or a law enforcement agency in Canada to aid an investigation undertaken with a view to a law enforcement proceeding or from which a law enforcement proceeding is likely to result.

- (i) In compassionate circumstances, to facilitate contact with the next of kin or a friend of an individual who is injured, ill or deceased.

Signature of Staff Person releasing information

Date

Return all completed original forms to:

Office of the CEO and Chief Librarian
Grimsby Public Library
18 Carnegie Lane
Grimsby, ON L3M 1Y1