

Title Privacy Policy
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Purpose

All users of the Caledon 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. Personal information may be provided in any of three formats – in person, in writing, or electronically. This policy covers all three circumstances.

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). 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 Caledon Public Library collects personal information for the purposes of identifying customers, in order that they may borrow materials and access programs and electronic services.

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 12 and of teens aged 13 – 17 without appropriate identification of their own.
- Information about what an individual library user has borrowed or items placed on hold
- Information about outstanding fees and other charges
- Information related to registration for Library programs or participation in contests
- Information related to recruitment of staff and volunteers; and,
- Information about individuals' requests for material through interlibrary loan. As part of a provincial interlibrary loan network, some of this information resides on servers managed by other organizations and the Library cannot definitively guarantee the use of this information.

Date of Birth identifies patrons with similar/same names and allows the Library to update borrower records to reflect changes in account type and related privileges.

The Library collects comment forms, letters, and Requests for Reconsideration from individual users. The names of anyone submitting forms or correspondence that are included in a Board package may appear on the Board's public documents. Any correspondence related to personnel or property issues shall be treated as confidential, to be addressed at an in-camera session of the Library Board.

Use of Information

The collection of personal information is limited to that which is necessary for the administration of the Library and the provision of library services and programs

The purposes for which personal information is collected from an individual is identified by the Library at, or before, the time the information is collected and that consent is given by the individual at that time. This includes the following:

- Contest submissions may be shared with the public for the purposes of advertising, promotion and display. Contest participants may be required to complete a Contest Permission Form and/or Privacy Waiver.
- The Library also collects photos and videos of library users at library events and programs, hosted both in person and virtually, and advises program participants that they may be included in group photos and/or recordings. Photos and videos will be used solely for library purposes and may be included, in illustration, advertising and publicity material on behalf of Caledon Public Library, including but not limited to the promotion of library programs and services.

As using personal information for other purposes than originally intended is not permitted by MFIPPA, if the Library wishes to use a patron's personal information for a purpose that is not consistent with the one for which it was originally obtained or compiled, it must first acquire the patron's written consent to use the personal information for that new purpose.

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 patrons served by our Visiting Library Service. Information about the items borrowed is not kept once the material is returned to the library unless it is incomplete or damaged. Individual patrons can also opt to

retain their borrowing history. This functionality must be enabled by the patron within their account preferences in the Library's online catalogue.

Disposal

Borrower accounts are deleted from the database after four (4) years of expiry as long as there are no outstanding items and/or fees in excess of \$10.00. Personal information that is submitted online to register for a library program or enter a library contest is retained for one year following the program, contest or event and is then purged from the database.

Access to Personal Information

Access to customer information is limited to:

- Library employees and authorized service providers, working within the scope of their duties
- Volunteers tasked with delivery of library materials as part of the Visiting Library Services program, for accounts for which a valid Patron Account Waiver has been provided.
- 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.
- If a library card belonging to another person is presented, it implies consent to borrow items, pick up material on hold for that person, or confirm outstanding items. With the exception of the linked account functionality through a supported library application, a digital version of a card stored on a mobile device does not imply similar consent.

Individuals wishing to pay fines on another patron's account may do so without the need for a card, but shall not receive an invoice detailing the specifics of such charges. In such a case, or if a person presents an overdue notice or collection letter addressed to another person, it does not allow 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.

Online Privacy

Personal account information, collected through the Library's website may include name, address, telephone, e-mail as well as items checked out, on hold and resulting fees. Verification of the library card number, user name, and/or PIN is facilitated through the Library's automated patron database.

In addition to the personal information collected by the Library through its website, additional information is collected and managed by third-party service providers on the Library's behalf as a means of delivering value added services. In such cases, the Library may not have authority over the collection or retention of personal information. Users are urged to consult the privacy policies of the specific websites and services before providing any personal information.

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 a Personal Identification Number (PIN) through the online catalogue or mobile app. Customers may also create a user name that will appear in the catalogue when reviewing, commenting on or recommending material to other members of the public, or when creating shelves. All users can create an anonymous user name, as well as change their personal privacy settings from within their online library account.

The online catalogue, when accessed using an in-branch library workstation, is programmed to close after a short period of inactivity 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 Caledon Public Library website may be required to enter their library card number, user name, and/or PIN to access the databases. These entries are verified against the automated Library's patron database.

Links to websites of digital resource providers and other organizations are included on the Caledon Public Library's website. These links are provided for ease of access and information only and are not subject to the privacy policy of the Caledon Public Library.

Computer Workstations

Visitors making use of the Caledon Public Library's computer workstations are cautioned that any personal files stored on the hard drive may not be immediately deleted upon completion of their session. 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.

Wireless Internet

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

Electronic Communication

Customers may use e-mail, chat or text messaging to contact library staff. This communication may include the e-mail address, phone number, 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 account until deleted.

Polls or surveys may be featured on the Caledon Public Library webpage to gauge public opinion. The provision of personal or identifiable data is optional and any information collected will be used to improve library collections, programs and services.

Electronic Messages under Canada's Anti-Spam Legislation

In keeping with Canadian Anti-Spam Legislation (CASL), email addresses collected by the Library 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.

The Library ensures that all electronic messages clearly identify the subject of the communication, the sender, including the Library' address and contact information, as well as a means for an individual to unsubscribe from receiving further messages.

At the time of registration for a library card, specific pieces of information are collected (see Section 1 above). Obtaining a library card implies the individual's consent to authorize the library to send electronic notifications regarding personal borrowing and transaction activities if an e-mail address was provided at the time of registration. Individuals may request not to receive electronic notifications although such an action may affect their ability to use the affected library services.

Caledon Public Library may, at times, use electronic means to promote services, share information, or announce special events. The Library will provide an opportunity for individuals to sign up to receive such specific notifications, and will seek the individual's consent before sending promotional electronic messages and notifications. The Library will provide options to individuals to easily unsubscribe from these services or to change their preferences at any time.

Responsibility for Privacy

The Board is responsible for personal information under its control and designates the CEO/Chief Librarian as the individual accountable for the Library's compliance with legislation. The CEO/Chief Librarian ensures that the policy with respect to collection, use and disclosure of information is followed.

All library employees will be made aware of the importance of maintaining the confidentiality of personal information.

Any library user who feels their privacy has not been protected may challenge library practices with the CEO/Chief Librarian. A library user who remains unsatisfied with the result of the CEO/Chief Librarian's review and response may appeal to the Library Board, maintaining either the current policy has been violated or that the current policy needs to be changed in order to address a perceived issue.

A breach is any unauthorized or illegal collection, use, or disclosure of personal information. In the event of a breach the CEO/Chief Librarian or her/his designate will:

- a. Contain the breach and repatriate the information
- b. Assess the severity of the breach
- c. Notify affected parties and the Information and Privacy Commissioner as required
- d. Investigate the cause of the breach
- e. Implement corrective actions

Access Requests

All Caledon 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 Caledon 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 Caledon Public Library's CEO/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 CEO will be provided to the individual or group submitting any request.

The CEO/Freedom of Information Coordinator can be contacted at:

Office of the CEO and Chief Librarian
Caledon Public Library
150 Queen Street South
Bolton, Ontario L7E 1E3
ceo@caledon.library.on.ca

Contravention of Policy

As per the *Caledon Public Library Operational Policy (CPL-16-04)*, the Caledon Public Library Board reserves the right to remove the privileges of any library user found in contravention of the Caledon Public Library Board's policies. As per the Caledon Public Library Personnel Policy (CPL-16-09), employees found to be in contravention of this policy will be subject to the relevant progressive discipline guidelines.

Related Documents:

- [Municipal Freedom of Information and Protection of Privacy Act](#), R.S.O. 1990, c. M.56
- [Public Libraries Act](#), R.S.O. 1990, c. P.44
- [Canada's Anti-Spam Legislation](#)
- Operational Policy (CPL-16-04)
- Records Management and Retention Policy (CPL-17-22)
- Caledon Public Library Disclosure of Personal Information Form
- Caledon Public Library Privacy Waiver

Staff Acknowledgement

I hereby acknowledge that I have read the Caledon Public Library's Privacy Policy (CPL-15-01). I understand my responsibilities as an employee and representative of the Library, and will act in accordance with the Policy and Guidelines.

Name

Signature

Date