

Title Privacy Policy
Policy Number CPL-15-01
Approval Date January 20, 2020
Review Date January 2022
Notes Previously approved November 16 2015 and November 20 2017



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.

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 Caledon 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 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.
- 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 recruitment

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 system collects comment forms, letters, contest submissions and Requests for Reconsideration from individual users. Comment forms addressed to staff are used internally to improve services. Comment forms that affect overall services are reviewed by senior staff and, at times, by the Library Board. Comment forms may form part of the Board package. The names of anyone submitting forms that are included in a Board package form part of that package and may appear on the Board's public documents.

The Library may also participate in Town initiatives to engage residents. As with general comment forms, submissions are used internally to improve services and may be shared publicly as part of the Library Board meeting package. Once reviewed by the Library's Management Team, any such forms are forwarded to the Town of Caledon and are then retained or disposed as per Town procedure.

Correspondence received by the Library Board or Staff may form part of the Board's public documents.

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 and advises program participants that they may be included in group shots. 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. Consent is sought to authorize the Caledon Public Library to re-use and re-publish photographic/video portraits, pictures and contest materials.

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 digital catalogue.

Disposal

Once completed membership forms have been input and checked they are shredded. 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 the CPL Mobile 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

The use of the Library's digital 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. Personal account information can include name, address, telephone, e-mail as well as items checked out, on hold and fines/fees. Verification of the library card number and PIN is done through the Library's automated 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 Caledon Public Library website may be required to enter their library card number and PIN to access the databases. These numbers 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. Users are urged to consult the privacy policies of the specific websites and services before providing any personal information.

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 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 mail 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.

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.

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 his/her library card or other approved identification, a customer may query his/her records and/or the records of his/her 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 C.E.O./Freedom of Information Coordinator can be contacted at:

Office of the CEO and Chief Librarian
Caledon Public Library,

6500 Old Church Road
Caledon East, Ontario
L7C 0H3
Telephone: 905.857.1400 X215
E-mail: 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.

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