



Bibliothèque publique de
Clarence-Rockland
Public Library

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Policy Title:	Confidentiality & the Protection of Privacy	Policy Revision: 2019-06-18
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The Clarence-Rockland Public Library recognizes that the users' choice of materials they borrow and websites they visit is a private matter. The Library will therefore make every reasonable effort to ensure that personal information about its users and their use of Library materials, services and programs remains confidential.

Section 1: General

1. Personal information is defined in **Municipal Freedom of Information and Protection of Privacy Act**, R.S.O. 1990, c. M56 (**MFIPPA**), in part, as “recorded information about an identifiable individual.” This could include, in the Library context, information on a user’s borrowing habits, as well as information related to computer use, including sign-up sheets and information on Internet use.
2. For the purposes of the registration of Library users and the administration of circulating items, the Clarence-Rockland Public Library collects the following types of personal information: name, address, telephone number, email address, gender, date of birth and language preference. In both cases, this personal information will only be disclosed to the user, except if disclosure to a third party is required by law. If a user brings a Library card that belongs to another person, it implies consent for them to pick up material on hold for that person. It does not allow the user to have access to other information in that person’s record.
3. The Board ensures that:
 - a. the Library complies with the spirit, principles and intent of **MFIPPA**;
 - b. members of the public have access to information about the operations of the Library and to their own personal information held by the Library in accordance with the access provisions of **MFIPPA**;
 - c. the privacy of an individual’s personal information is protected in compliance with the privacy provisions of **MFIPPA**.

4. The Board is responsible for personal information under its control and designates the Chief Executive Officer (CEO) as the individual accountable for the organization's compliance with legislation and ensures that:
- a. the purposes for which personal information is collected shall be identified by the Library at, or before, the time the information is collected;
 - b. consent of the individual is acquired for the disclosure of collection use or personal information;
 - c. the collection of personal information shall be limited to that which is necessary for the proper administration of the Library and the provision of Library services and programs;
 - d. the Library will not retain any personal information related to the items borrowed or requested by a user, or pertaining to a user's on-line activity, longer than is necessary for the provision of Library services and programs;
 - e. the Library will not disclose personal information related to a visitor or a Library user to any third party without obtaining consent to do so, subject to certain exemptions as provided by **MFIPPA**. Information will be disclosed:
 - i. to a parent or guardian of a person up to sixteen (16) years of age;
 - ii. upon the presentation of a search warrant;
 - iii. to police in the absence of a search warrant to aid an investigation (on the CEO's discretion); and
 - iv. personal information may be released in compassionate circumstances to facilitate contact with next of kin or a friend of an individual who is injured, ill or deceased;
 - f. personal information shall be as accurate, complete and up-to-date as is necessary for the purpose for which it is used;
 - g. personal information shall be protected by security safeguards appropriate to the sensitivity of the information;
 - h. upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information, and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate; and
 - i. an individual shall be able to address a challenge concerning compliance with the above principles to the CEO.

Section 2: Collecting Personally Identifiable Information for Purposes of Accessing the Public Web Site of the Clarence-Rockland Public Library

Citizens do not have to provide personal information to visit the Clarence-Rockland Public Library website or to download information, except in these circumstances:

- a. A Library card is required to access the My Account features of the catalogue (such as viewing items checked out and viewing or changing hold requests).
- b. A Library card number is also required for accessing certain electronic database products

from home.

- c. In this context the number is required for authentication as a Library user and is not tied to personal information.

Section 3: Security of Personal Data

1. The Clarence-Rockland Public Library collects the personal information of Library users under the authority of section 23(2) of the **Public Libraries Act**, R.S.O. 1990, c.P.44, as amended, for the purposes of Library user registration and the administration of circulating items. Personal information collected for these purposes will only be used internally at the Clarence-Rockland Public Library.
2. The Library CEO limits employee access to personal information to only those employees who need access in order to perform their assigned duties.
3. The Clarence-Rockland Public Library maintains security standards and procedures regarding unauthorized access to personal information to prevent unauthorized removal or alteration of data.
4. The IP address of a computer accessing the Clarence-Rockland Public Library website is recorded for the purpose of website usage analysis. There is no attempt to associate any IP address with an individual user.
5. For its remote services the Clarence-Rockland Public Library uses session-based cookies to manage authentication (e.g. My Account in the catalogue and the use of database products from outside the Library), and persistent cookies to collect data that is not personally identifiable for statistical reporting purposes only. A cookie is a small file that stores information. A cookie is considered persistent if the file is stored on a hard drive, whereas a cookie that is discarded when the browser is closed is considered to be a session-based cookie.
6. Clarence-Rockland Public Library allows access to books, movies and downloadable audiobooks through a subscription to OverDrive and Cantook Station, linked from its website. OverDrive and Cantook Station employ Digital Rights Management software to provide a borrowing period for loaned items to correspond with the contractual relationships between them and the publisher of the items. The software is not used to communicate user information back to OverDrive and Cantook Station or the Clarence-Rockland Public Library.
7. Various websites may be linked through the Clarence-Rockland Public Library's website. Visitors to linked websites are advised to check the privacy statements on those sites and to be cautious about providing personal information without a clear understanding of how that information will be used.

Section 4: Users' Right to Access

Users may request access to their personal information at the Clarence-Rockland Public Library. They have the right to request the correction of any personal information that is incorrect or incomplete.

Section 5: Disclosure of information other than users' personal information will be subject to MFIPPA.

1. All formal requests for access to information must be sent in writing to:

Library CEO
2-1525 du Parc Avenue
Rockland, ON K4K 1C3

2. The initial fee for all formal requests is \$5. This fee must be included with the request. Users' formal **MFIPPA** request will not be processed until the fee is received. There is no fee when users are requesting access to their own personal information.

Related Documents:

Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c. M56
Information and Privacy Commissioner of Ontario. **What are the Privacy Responsibilities of Public Libraries?** 2002.

Clarence-Rockland Public Library. **OP-07 - Internet Access Policy**

Clarence-Rockland Public Library. **OP-12 – Circulation Policy**

Clarence-Rockland Public Library. **OP-13 – Fees Other than Circulation**

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