

<b>Policy Number</b>	<b>1.16</b>
<b>Title</b>	<b>Privacy Policy</b>
<b>Section</b>	<b>1: General</b>
<b>Effective Date</b>	<b>August 22, 2017</b>
<b>Review Date</b>	



The Cobourg Public Library recognizes that all visitors have the right to privacy and confidentiality regarding their use of the Library's services, collections and online spaces, and the collection of personal information. In matters related to privacy and access to information, the Cobourg Public Library is guided by the Ontario ***Municipal Freedom of Information and Protection of Privacy Act***, R.S.O. 1990, c. M.56, known commonly as (MFIPPA)

## **Section 1: The Library and Privacy**

The Cobourg Public Library Board will protect the privacy of all individuals' personal information in its custody or control, in keeping with the privacy provisions of MFIPPA and other applicable legislation.

### **1. Collection of information**

- a. Personal information is defined in ***Municipal Freedom of Information and Protection of Privacy Act***, R.S.O. 1990, c. M.56 (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.
- b. The Cobourg Public Library collects the following identifiable pieces of information:
  - name, address, telephone number and e-mail address of each registered library user
  - date of birth of registered library users under the age of fourteen
  - information about what an individual library user has borrowed or items placed on hold
  - information about fines
  - information about a public meeting room space booked by a specific individual
  - information about programs an individual has registered to attend
  - information about when an individual booked a public computer
  - information about individuals requests for material through interlibrary loan. As part of a provincial interlibrary loan network, some of this information resides on servers in other places and the Library cannot definitely guarantee the use of this information.
- c. The Library collects comment forms, requests for material reconsideration and correspondence from individual users. All correspondence received is part of the Board's public documents except for correspondence related to personnel or property issues which would be treated as confidential and handled in an in-camera Library board session.
- d. The personal information may be given in any of three formats – in person, in writing, electronically – and this privacy policy covers all three circumstances.

### **2. Use of information**

- a. 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
- b. 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

- c. 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.

### **3. Disclosure of information**

- a. The Library *will not* disclose personal information related to a visitor or library user to any third party without obtaining consent to do so, subject to certain exemptions as provided in section 32 of MFIPPA. Disclosure is permitted in some situations, including the following:

The Library will disclose personal information to a parent or guardian of a person up to sixteen (16) years of age who exercises the right of access to the child's personal information in the user or circulation databases.

- b. The Library *may* also disclose information in accordance with the exemptions provided in section 32 of MFIPPA, including:

Subsection (g), disclosure 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;

Subsection (i), disclosure under compassionate circumstances, to facilitate contact with the spouse, a close relative or a friend of an individual who is injured, ill or deceased;

### **4. Retention of information**

- a. 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. The retention of personal information includes the following situations:

Personal information regarding library transactions is retained in the user database as long as the circulation record indicates that an item remains on loan or fees remain unpaid.

Records of returned items that have no outstanding fees/charges remain on the user record in the circulation database until the end of the working day.

Personal records of all users who have not used their cards in the previous three (3) years and do not have outstanding fines are purged on an annual basis.

all such information is erased at the end of the day upon which the computer is used.

- b. The Library *may* retain personal information related to library functions or services as described below, when users voluntarily opt in to do so; for example, in order to enhance or personalize library functions or services.

The personal information and borrowing history of Home Library Services users are retained with their permission. This is done in order to assist staff in selecting and delivering materials for the user.

Records relating to the answering of questions and/or in-depth research for the public in person, by phone, or e-mail, are retained for two years.