

## DEFINITIONS

Public library Boards are institutions governed by the *Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)*. This Act specifies how organizations such as libraries may collect, use, retain, disclose and dispose of personal information.

Public Library Boards are governed by the *Public Libraries Act R.S.O. 1990, c.P. 44* for administration of library operations.

The CEO is the Freedom of Information/Privacy Officer for Lake of Bays Township Public Library.

## **POLICY**

Lake of Bays Township Public Library (the Library) is committed to protecting the privacy of the personal information given to us by individuals wishing to use library services. The Library collects this information in accordance with the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) and under the authority of the Public Libraries Act in order to conduct library operations.

### **Information Collected**

The Library collects the following information when registering a new user: name, address, telephone number, name of guardian (in the case of minors 14 years of age and under), proof of identification and email address (optional).

#### Reasons for Collecting this Information

This information is collected and used by Library staff for the purpose of the provision of library services including:

- Access to Library materials and services
- Informing individuals about outstanding library materials, fines or fees
- Program registration
- Room or equipment rentals
- Library fundraising
- Customer alerts to programmes and services they may want to use
- Electronic communications for hold and due date alerts and overdue notices
- Electronic newsletters
- Non-identifying statistical purposes

Information will only be used for the purposes that it was collected and will not be disclosed except with consent as required by law.

Borrower accounts are deleted from the database after 5 years of inactivity.

## **Consent**

The consent of obtaining this information is provided by the patron at the time of registration. In the event of a minor, consent is obtained from the appropriate guardian or parent. We may also obtain consent through application forms, a check off box on a form or electronically through the website. An individual may choose not to allow the collection of personal information but it may hinder the ability to use Library services.

## **Online Privacy**

### **What information is collected, and why?**

When a user visits our website, we collect information about the visit that does not identify the user personally. We track information such as the domain from which the user is visiting and the user's browser type. We also collect specific information regarding the user's session on our website. This includes items such as the date and time of the visit and the pages viewed.

Sometimes we ask a user to voluntarily provide personally identifiable information. This information generally includes, but is not limited to, name, e-mail address, postal address, and telephone number. We request this information when the user requests one of the following:

- To register to attend an on-line seminar or demonstration
- To sign up for a mailing list
- To correspond with us

### **How is the information used?**

Non-personally identifiable information is collected to allow us to analyze how our website is used and to improve the content and service the website provides.

Personally identifiable information is collected for analysis to improve the content of the website and the services we provide the user.

The Library owns the collected information and will not sell, trade, or rent the information to others. We may use the information to continue contact with the user. This may include contact such as follow-up calls, e-mail correspondence, or mail correspondence to follow-up on the contact or to provide marketing information about promotions, new services, or important website changes.

### **Cookies**

"Cookies" are small pieces of information that are placed on a web user's hard drive. The Library uses cookies to provide better user experience. Browsers can be set to refuse cookies

Patrons using the Internet Public Access Catalogue (IPAC) to set holds and check their personal borrower account must enter their library card number for verification.

Links to websites of other organizations are included on the Library's Public website. These links are provided for information only and are not subject to the Library's privacy

policy. Patrons are urged to consult the privacy policies of the specific websites before providing any personal information.

### **Online Public Access Catalogues (OPACs)**

OPACs provide access to the Library's Internet Public Access Catalogue (OPAC), databases and selected websites. The use of the Library's online catalogue does not require the provision of any personal information unless account access is required. Users can access their personal library account with their library card number. Personal account information can include name, address, telephone, e-mail as well as items checked out, on hold plus fines/fees. Verification of the library card number is done through the automated library system's patron database. A log of this verification remains on the database server for a short time and is automatically purged. OPACs are programmed to close after a short period to prevent access to personal information by other patrons. However, it is advisable to logout when finished with the OPAC.

### **Computer Workstations**

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.

The Library uses the software DeepFreeze that automatically deletes any temporary files and records of websites visited when the computers are shut down each night. Patrons are cautioned that any personal files stored on the hard drive may not be deleted when their computing session is closed.

### **Wireless Internet**

The wireless network provided by the Library is a password protected network. The unique identifier of each patron's device accessing the wireless network as well as the time spent on the wireless network is recorded.

### **Electronic Communication**

Patrons may use email to contact Library staff. This communication may include the email 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.

### **How to Access Personal Information**

#### **Informal Access Requests**

All Lake of Bays Township Public Library patrons have the right to access their personal information as well as information regarding Library operation. The request may be submitted on an informal or formal basis, depending on the nature of the request. Any

requests are subject to exemptions outlined in MFIPPA. Patrons must provide appropriate identification before personal information will be provided. Library staff may assist patrons if required.

### **Formal Access Requests**

Any formal requests for personal or operational information must be done in writing or through an Access to Information Form. The form is available at Lake of Bays Township Public Library branches and on the Library's website. 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 delivered to the Lake of Bays Township Public Library CEO, who serves as the Freedom of Information / Privacy Officer. The CEO will review each request and 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 Privacy Officer can be contacted at:

Linda Lacroix, CEO, Lake of Bays Township Public  
Library, 10 University St.  
Baysville, ON, P0B 1A0  
Telephone: 705-767-2361  
E-mail: linla@vianet.ca

### **Appealing Access Requests**

Any decisions by the CEO regarding requests for information may be appealed to the Information and Privacy Commission. The Appeal Form and information on the appeal process are available on the Information and Privacy Commission's website [www.ipc.on.ca](http://www.ipc.on.ca)

### **Collecting Personal Information**

Patrons have the right to request a correction of personal information if erroneous data are identified. The Library has a right to request supporting documentation from a patron when making any corrections.

### **Personal Information requested by Law Enforcement Agencies**

In the case of a library being presented with a valid search warrant, disclosure would be mandatory, however under section 32(g) of MFIPPA the library would be able to exercise its own discretion regarding whether to release the information to police (in the absence of a search warrant).

**Policy** Lake of Bays Township Public Library Board

Date approved:                      Number:    Page **5** of **5**

Title:    **Privacy Policy**

Date reviewed:

A year-end statistical report for the Information and Privacy Commissioner of Ontario is filed under MFIPPA annually.

Approved: May 30<sup>th</sup> 2016

Reviewed: May 2020

Signature of the Chairperson \_\_\_\_\_