

# Protection of Customer Privacy Policy

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## Purpose

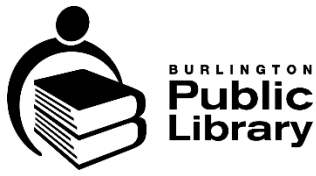
To ensure that the Burlington Public Library Board complies with the Municipal Freedom of Information and Protection of Privacy Act, R.S.O 1990 (MFIPPA) and Canada Anti-Spam Legislation (CASL) by protecting an individual’s personal information and privacy in their transactions with the library.

## Statement of Policy

Burlington Public Library is committed to protecting the personal privacy of all library customers. In accordance with provincial and federal legislation, records maintained by the Library that record an individual’s personal use of the library’s collections, programs or services constitute confidential information and are held in trust by the library.

Objectives of this policy are:

- To ensure BPL complies with the principles and intent of MFIPPA (1990) in protecting the privacy of library customers.
- To ensure that library customers have access to their own personal information, provide or decline consent, maintain accuracy, request clarification or challenge practices.
- To ensure that the library will state the purpose of collecting personal information and will obtain consent for its use with exception of consent implied by obtaining a library card.
- To ensure that the library will comply with all principles and intent of CASL regarding electronic communication.
- To ensure that the privacy policy is enforced by all library staff and any organization that may have legitimate access to this information to provide service.



## Definitions

For the purpose of this policy the following definitions from the Municipal Freedom of Information and Protection of Privacy Act, 1990 and Canada Anti-Spam Legislation are used:

**Personal Information:** Identifiable information about an individual such as name, phone, address, email, date of birth, etc. and any correspondence between the individual and the organization which may or may not be confidential in nature. Exceptions and further definition are defined in the Act.

**Record:** Any record of information however recorded, whether in printed form, on film, by electronic means or otherwise.

**Spam:** An electronic message sent without explicit or implied consent of the recipient.

## Policy Details

### Purpose for which personal information may be collected

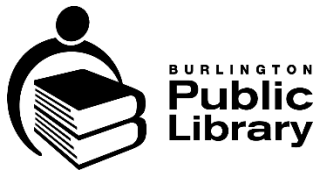
The primary purpose for which BPL collects personal information is for the administration of library services, development of resources and programs—the planning, executing, and evaluating of these services, resources, and programs consistent with this.

### Collection of Personal Information

The library collects personal information to conduct its business to fulfill library service to the community. Library service may be access to collections, resources, databases, programs, Wi-Fi, personal computers, service, fundraising, room rentals, collecting of fees, etc. A customer of the library may not necessarily require a library card, but they may have personal information collected for a particular purpose, such as attending a program, making a donation, or renting a room.

### Consent

Obtaining a library card, attending a registered library program, using, or booking a library service or resource implies the individual's consent to authorize the library to collect and access personal information, including borrowing and transaction history, for the purpose of conducting the library business.



Possessing a library card, overdue notice or collection letter by another person implies written consent for the holder to pay fees or pick-up materials on behalf of the card owner but does not allow access to personal records. Individuals can provide consent for another person to access their records by signing a consent form.

Individuals may choose not to allow the collection of their personal information however this action may affect their ability to use affected library services, resources, programs, and room rentals.

## Use and Disclosure of Personal Information

Personal information will only be collected in accordance with MFIPPA. Personal information will not be shared, used, or disclosed for purposes other than that for which it was collected, except with the consent of the individual, exceptions outlined in this policy or as required by the law.

Personal information may be shared with agencies and companies working to provide resources and services on behalf of the library and in compliance with this policy.

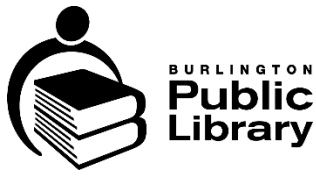
Personal information including borrowing and transaction history, will not be disclosed to another person unless to a parent or guardian, who is listed as the guardian responsible, for a person who is less than 16 years of age, or where a written signed consent form is provided.

Staff will honour court orders issued by a judge that require the release of personal information. With approval of the Chief Executive Officer, staff may also disclose personal information in compassionate circumstances. Any disclosure to law enforcement officials or in compassionate circumstances must be reported to the Library Board, without identifying the individual concerned.

## Electronic Communication

The library will ensure that all electronic messages clearly identify the subject of communication, the library's email address and contact information and identify Burlington Public Library as the sender.

Obtaining a library card implies the individual's consent to authorize the library to send electronic notifications regarding personal borrowing, transaction activities, services, and fundraising using their preferred method. The library will provide options for individuals to opt out or unsubscribe from the service or change their preferences at any time.



## Accountability

BPL uses reasonable security measures to protect against risks such as unauthorized access, collection, use, disclosure, or disposal of personal information. Measures include administrative, physical, technological, and operational safeguards that are appropriate to the nature and format of personal information.

Customers should report any lost or stolen library cards immediately to library staff to reduce the potential for unauthorized access to their records and protect their information.

All library staff and volunteers will fully comply with the provisions of MFIPPA and CASL in administering the policy within the scope of their duties.

Questions regarding the collection and use of personal information can be directed to: Chief Executive Officer, Burlington Public Library 2331 New St., Burlington, ON L7R 1J4.

## Retention

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 necessary for the provision and planning of library services and programs, unless a longer period is required by law.

The Library may, however, retain personal information related to library services and programs when users consent for the library to do so; for example, to enhance or personalize library services and programs.

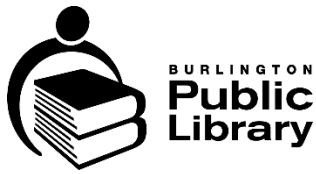
Inactive customer records with no outstanding balance are purged after five years.

Customers who have an outstanding balance on their account, may have their information forwarded to a collection agency to recover lost or damaged materials.

## Accuracy

All personal information collected shall be as accurate, complete, and up to date as is necessary to fulfill the purpose for which it is collected.

The Library will update customer information and ensure that the collection, storage, and disposal of information are carried out in a manner that conforms to legislation.



Customers are responsible for identifying changes in personal information such as name, address or contact information to maintain the accuracy of their information.

## Access

Individuals have access to their own personal information about themselves. Parents or legal guardians who are listed as the responsible person for the child, may obtain information about their child's account until they are 16 years old.

## Research

The Library may, on occasion, permit valid research by an external partner which may include the use of customer library records. Any such research conducted will be governed by this policy and vetted through the ethics committee of the research organization that is engaged. Any personal information that may be used under approved terms for research purposes will be destroyed before publication of any research results.

## Privacy By Design

The Library will endeavor to apply Privacy by Design principles in technology, business practices, and physical design to protect customer privacy when conducting library business.

## Appendices: References

[Government of Ontario - Municipal Freedom of Information and Protection of Privacy Act, R.S.O 1990 \(MFIPPA\)](#)

[Government of Canada - Canada Anti- Spam Legislation \(CASL\)](#)

[Information and Privacy Commissioner of Ontario - Privacy by Design](#)

- Effective Date: May 19
- Projected Review Date: 2027
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- Associated Procedures: Fees and Charges Policy, Borrowing Policy.