

Confidentiality of Library Customer Records Policy

Policy Statement

To protect customers' rights of free speech, free thought and free association, the library will maintain confidentiality of library customer records to the fullest extent permitted by law.

Regulations

1. Customers have the right to be informed about the policies governing the amount and retention period of personally identifiable information and about why that information is necessary for the provision of library services. See also *Records Retention* policy.
2. Customer registration information is exempted from disclosure in the Michigan Freedom of Information Act¹.
3. The library will avoid collecting and retaining information not needed for the fulfillment of its mission and will engage in practices to prevent placing records on public view.
4. Information the library may gather and retain about current and valid library users may include the following:
 - A. Library circulation system
 - i. Information is collected in order to maintain an accurate record of items borrowed, to provide a means of notification and contact and to record outstanding fines and fees.
 - ii. Information collected includes: name, address, phone number, e-mail address, driver's license number, sex, date of birth, items currently checked out, fines owed, fines paid or waived, current holds requests and informational notes related to library card account matters.
 - iii. Radio frequency identification (RFID) tags in materials include item barcode number and security gate on/off bit.
 - B. Internet access
 - i. Information is collected to allow automated management of the library's public computer resources.
 - ii. Information collected includes: barcode number, computer time used for the day, allowed computer time and monetary balance.

¹ MCLA 15.243 *et seq.* Freedom of Information Act

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- iii. Workstations may accumulate browser histories, cookies, downloaded files and favorites during a user's session.
 - C. Web-based events application
 - i. Information is collected to manage library program and event registration. It includes name, phone number, e-mail address, grade, age and library card number.
 - D. Web-based summer reading application
 - i. Information is collected to manage summer reading logs. It includes name, phone number, e-mail address, school, grade and total time read.
 - E. Surveillance recordings
 - i. The library records people using the library in order to increase security and to provide a means of identification should an incident occur.
 - F. Meeting room applications
 - i. The library requires an application for the use of its meeting rooms (see *Meeting Room Use* policy) in order to verify eligibility, designate a responsible party, and to provide a point of contact. It includes name, organization, phone number, and library card number.
 - G. Credit card transactions
 - i. The library adheres to all Payment Card Industry Data Security Standards (PCI DSS) and uses third party applications to process credit card transactions. No credit card holder information is retained by the library.
5. Access to records shall be restricted as much as possible and treated as confidential:
- A. Staff shall only access records required to complete library work as assigned and appropriate to job duties.
 - B. Staff shall only provide account information to the library cardholder, unless the person inquiring is listed as a parent, legal guardian or authorized user.² This includes questions about whether or not a person has a library card.
 - C. Records may be shared with designated agents of the library if required for the conduct of the library's activities, e.g., a collection agency.

² MLC 397.601 *et seq.* Library Privacy Act
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- D. Records may be shared with a third party to conduct library business unless a customer chooses to opt out.
- E. The library may use records to distribute library-related information to registered borrowers.
- F. The library may use information collected in aggregate for statistical analysis and planning purposes.
- G. The library director is the designated custodian of records.
- H. The library director or a person designated by the library director may disclose surveillance recordings to a law enforcement officer so long as it does not include images of any activity or other document or record that identifies a person as having requested or lawfully obtained specific services, materials, or information resources from the library.
- I. Any other disclosure of library records is prohibited unless required by law.

Approved: March 17, 2021
Clinton-Macomb Public Library Board of Trustees