



<b>Policy Name</b>	Privacy and Confidentiality of Customer Information		
<b>Section &amp; Number</b>	Board – G-31	<b>Effective Date</b>	2024-03-21
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<b>Author</b>	CEO	<b>Next Review</b>	2028

## Policy Statement

The St. Catharines Public Library (SCPL) is committed to protecting customers' personal information and privacy. Customers have the right to privacy as outlined in the Ontario's Municipal Freedom of Information and Protection of Privacy Act (MFIPPA).

Any collection, use or disclosure of personal information by SCPL is done in accordance with [MFIPPA](#), [Canada's Anti-Spam Legislation](#), and Canadian Federation of Library Association's [Statement on Intellectual Freedom and Libraries](#).

## Scope

This policy applies to all SCPL employees and volunteers and by any person working under contract to SCPL who has access to the personal information of customers.

SCPL collects personal information under the authority of the MFIPPA for the purpose of conducting the Library's business which may include fines, holds, overdue notices, fundraising and programs.

## Definitions

**Personal Information** is identifiable information about an individual such as name, phone, address, email, date of birth, financial transaction, etc. Exceptions such as personal information in context of doing business, or persons deceased for over 30 years, etc. are defined in the MFIPPA.

**Spam** means an electronic message sent without explicit or implied consent of the recipient.

## Regulations

[Municipal Freedom of Information and Protection of Privacy Act](#) (MFIPPA) provides a right of access to information under the control of institutions in accordance with the principles that (i) information should be available to the public, (ii) necessary exemptions from the right of access should be limited and specific, and (iii) decisions on the disclosure of government information should be reviewed independently of government, and protects the privacy of individuals with respect to personal information about themselves held by institutions and provides individuals with a right of access to that information.

[Canada's Anti-Spam Legislation](#) (CASL) protects consumers and businesses from the misuse of digital technology, including spam and other electronic threats. It also aims to help businesses stay competitive in a global, digital marketplace.

## Responsibility

The CEO or designate is responsible for the overall administration of this policy.

## Operational Guidelines

### **Collection, Use and Disclosure of Personal Information**

The Library collects customers' personal information (such as: name, address, telephone number, birthdate and email address) in accordance with MFIPPA to conduct the Library's business.

Examples of when information will be collected include, but are not limited to:

- When customers sign up for a library card
- When customers use the Library's electronic resources
- When customers use meeting rooms, computers and other equipment
- When customers register for library programs
- When individuals make donations to the Library

The Library uses personal information for the following purposes:

- Providing, delivering, managing and communicating library programs and services including but not limited to issuing library cards, circulating materials, addressing customer complaints, collecting fees, booking rooms, registering programs, and issuing suspensions
- Evaluating, planning and improving library programs and services
- Library fundraising

The Library does not share customers' personal information with any other organizations or companies without permission from customers, except when MFIPPA allows sharing, when contractors work within the scope of their duties on behalf of the Library, or when other applicable law says that the Library must share the personal information.

### **Security of Personal Information**

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

The Library's security measures do not protect information traveling over the Internet and cannot guarantee security and confidentiality of personal information sent through the Library's public Internet stations and wireless network, including e-commerce and banking transactions.

### **Accuracy and Retention of Personal Information**

The Library will take reasonable measures to ensure that the personal information it holds is accurate, complete and up-to-date.

The Library will retain the personal information it collects for as long as it is needed for the purpose for which it was collected. Once it is no longer required, it will be destroyed.

### **Third Party Vendors**

The Library works with third party vendors to provide online services, such as electronic databases, digital collections, and streaming services. When using some of these services, customers may be asked to create service-specific accounts and provide personal information. The Library's third party services are governed by their own privacy policies and practices, not the Library's. Customers are advised to consult their Terms of Services and Privacy Policies before agreeing to use these services. The Library provides a [webpage](#) summarizing these services with links for reference.

The Library only provides necessary information to these vendors to verify if a customer is a valid library card holder.

### **Library Website**

The Library collects IP addresses (a number that can uniquely identify a specific computer or other network device on the Internet) from visitors to the Library's website. No other personal information is collected when a customer browses the Library's website, unless the customer chooses to use services that require personal information, such as using chat service, booking a room or registering for a program. Except statistics, all other information is purged periodically.

The Library's web server keeps statistics on website access, such as which pages are accessed, when people browse the site, and what types of computers or web browsers visitors use. This information helps the Library improve online services and customer experience. The Library may also use cookies (small files that websites put on an individual's computer to store information about that individual's preferences) to enhance customer experience. Customers can choose to set their web browser to refuse cookies or to alert them when cookies are being sent. If they do so, some parts of the website may not function properly.

### **Privacy Breaches**

A privacy breach happens when personal information is stolen, lost, or shared without permission. If the Library finds out that there has been a privacy breach, staff will:

- Notify staff and the Board as applicable
- Investigate the situation
- Protect or contain any information possible and take appropriate steps to prevent a further breach
- Contact all affected customers
- Review the situation to recommend changes to policies or library operations necessary to prevent a future similar breach
- Keep a record of the breach
- Notify the Information and Privacy Commissioner of Ontario, and other organizations as applicable.

### **Electronic Communication**

The Library will ensure that all electronic messages clearly identify the subject of communication, the St. Catharines Public Library is identified as the sender, and that the Library's mail address and contact information is available.

Obtaining a library card implies the customer's consent to authorize the Library to send electronic notifications regarding personal borrowing and transaction activities using their preferred method. Customers may request not to receive

notifications although such an action may affect their ability to use the affected library services.

The Library may, at times, use electronic means to promote services, share information, or announce special events. The Library advises customers that their email may be used to receive promotional electronic messages and provides options to customers to easily unsubscribe from the services or change their preference at any time.

## Implementation

The CEO or designate will implement this policy.