

Bucks County Free Library

MANAGEMENT

PRIVACY AND CONFIDENTIALITY OF LIBRARY RECORDS

Policy Statement

Protecting user privacy and confidentiality has long been an integral part of the mission of libraries. In a library, whether use of its resources is physical or virtual, privacy includes the right of library users to control their personal information and make choices about what is shared with others. Confidentiality exists when a library is in possession of personally identifiable information of library users and keeps this information private on their behalf.

The Bucks County Free Library (BCFL) is committed to protecting each individual user's privacy and maintaining confidentiality in how we do business. This policy explains the steps the library takes to respect and protect a library user's privacy when using library resources, what information BCFL collects from library users, and how BCFL deals with that personally identifiable information collected.

BCFL is governed by the Pennsylvania Library Code, which states, in relevant part, that: "Records of [BCFL] which relate to the circulation of library materials and contain the names or other personally identifying information of users of the materials shall be confidential and may not be made available to anyone except by a court order[.]" 24 Pa.C.S. §9375.

The personally identifiable information of users collected by BCFL is used solely for the purpose of providing library services, such as patron access to physical resources, electronic resources, BCFL's facilities, and assistance from BCFL personnel. Therefore, records of a library user's registration information and the borrowing and use of library information materials, whether the materials are physical or virtual, as well as library equipment, are considered confidential. Also confidential are records of library users' transactions of any type, which include but are not limited to reference interactions, computer use logs, logs of Internet sites consulted, and the like, as well as records of transactions regarding fees and fines.

The policy may change from time to time to make any necessary updates for changes in the law or BCFL policy, and we will notify you by posting changes on our website and communicating with you directly should there be any substantive changes.

Information Collected

Personally identifiable information is collected:

- From library users
- Automatically through transaction logs
- Through website cookies

From Library Users

During the library card application process (or registration), library users provide BCFL with their name, address, phone number, date of birth, and e-mail address. This information is required by BCFL for a library patron to become eligible to borrow materials from BCFL and use other BCFL resources. This information is, in turn, maintained in the user's records and relied upon when BCFL material is checked out by a user, when charges are owed or payments are made, for requests for interlibrary loans and reference services, and for sign-up information for facilities, library classes and programs.

Personally identifiable information may also be collected when users donate, sign up for events and newsletters, or fill out other library forms.

Automatically Through Transaction Logs/Computer Use

BCFL uses an Integrated Library System (ILS) to manage its catalog, circulation records, and user records. The ILS stores personal data collected from BCFL library users. It also maintains records of what items users borrow, the holds they place, and bills they may incur. Specifically, BCFL's ILS generates logs when a user checks-in, checks-out, renews, places a hold, or pays a bill through a self-check kiosk, staff member, or their online account.

A library user's record maintains the user's borrowing history unless the user chooses not to save it. The default setting in the ILS when a new account is created is to track borrowing history. However, a user can change this setting to either opt out of saving their borrowing history or to delete their borrowing history at any time by logging into their account or requesting help from library staff. If a user chooses not to save history, the link between the user's account and item is broken 90 days after the item has been returned. If the item is associated with a bill, the connection between the item and user account is broken 90 days after the bill has been paid. When a connection is broken, the user's account number is deleted from the item's transaction logs.

BCFL also offers a wireless network that allows users to connect to the Internet. Users should be aware that data and information accessed and sent over the library's wireless network is not encrypted.

In addition, for library users who utilize BCFL computers and printers, BCFL uses computer access and reservation control software to manage the computer signups and printing. When a user logs into a BCFL computer, the software collects the library card number used to log in, the time the library card number was used to log in, and the length of time of a

user's session. Information, such as search histories, websites viewed or documents saved, that the user accessed during the computer session are wiped from the computer as soon as session ends.

Please note, however, that BCFL is not responsible for the privacy practices or security of outside, third-party websites accessed by library patrons on BCFL computers. BCFL shall have no liability for direct, indirect, or consequential damages related to the use of information accessed on the internet by library users from BCFL equipment. Library users must exercise caution to avoid unauthorized disclosure, use, and dissemination of personal identification information. Parents must caution their minor children which personal facts are not to be shared on the Internet.

Please also note that some BCFL website pages may contain links to external, third-party websites, services or content that are not maintained or controlled by BCFL. By following these links, you may be providing personal information, including, your name, username, email address, and password, directly to that outside third party. Similarly, BCFL cannot be responsible for your privacy when you disclose information to any of these outside websites. It is your responsibility to protect your personal information.

Through Website Cookies

BCFL uses cookies for website analytic software to track website usage while a user is on <https://buckslib.org>. The use of this analytics software is not set up to collect any personally identifying information about library users. The software used by BCFL collects information about pages viewed, demographics such as presumed age and gender, the operating system used, the user's internet service provider, and location based on the IP address with any identifying details removed.

BCFL's analytics data is currently supported by Google Analytics and Microsoft Clarity. Library users that do not want data from their personal computers sent to Google Analytics can install the Google Analytics opt-out browser add-on.

How Information May be Used and Shared

BCFL staff access user information only as part of the necessary performance of their job duties and as outlined in the Use of Patron Data in Library Advancement policy.

Certain library user information may also be shared with outside third parties engaged by the library, but only when it is required to manage, access and provide information resources directly to library users. Whenever possible, data sharing to third parties is restricted to the information that is necessary to authorize patron access to these resources.

Bill Collection and Materials Recovery

BCFL contracts with a material recovery agency to retrieve unreturned materials and unpaid fines and fees. User information is submitted to the collection agency for purposes of bill collection and includes the library user's name, library card number, phone number, email address, date of birth, address, home library, unpaid balance, and the most recent fine date. If a bill is disputed, item information for each bill may be shared with the agency. Bill collection information becomes part of the library user's record in BCFL's ILS.

Credit Card Payments

BCFL contracts with credit card services for credit card payment processing. All software and equipment used for processing credit card payments at BCFL fully complies with the Payment Card Industry Data Security Standard (PCI-DSS). BCFL's systems are subject to rigorous assessments and follow the strictest security protocols to protect against data breaches and unauthorized access. BCFL does not collect or store any credit or debit card information.

Donation Records

BCFL may also use information from its records of donations for building relationships and communicating with library users in order to enhance and improve library services. These files do not contain any borrowing or circulation information. BCFL will respect and follow donor wishes regarding if and how they prefer to receive library communications.

Newsletters

Library users may opt to receive emailed newsletters at the time of application for a library card or at any time by signing up on the website. Library users can opt out of newsletters at any time by clicking the unsubscribe link at the bottom of an email. Information collected for newsletters include name and email address.

Miscellaneous E-mail

An individual's email address used to send a message to any @buckslib.org email address may be stored by BCFL for staff to respond, shared with other library staff if necessary for response, and archived for future business needs.

Third-party Vendors and Other Outside Parties

Many of BCFL's library services, such as e-resources, are provided by third-party vendors. For those who choose to use one of these services, library users' personally identifiable information may be shared with the third-party vendors, including a user's name and email address, which is necessary to authorize user access to the electronic resources. Library users must be aware that BCFL has limited ability to protect the privacy of this information once it is outside BCFL's control. When choosing to use these third-party vendor resources,

library users are subject to the third-party's own privacy policy when using their services. We encourage each library user to review the privacy policies of every third-party website or service with whom the user interacts through our library services. A library user may choose not to use the third-party websites or services if the user does not accept the terms of use and privacy policies of the third-party vendor.

BCFL does not share user information with any third party for marketing or promotional purposes.

BCFL and its staff will otherwise disclose or distribute library user information to outside parties only as required by law, with notice from the library, or with the library user's authorization. Consistent with Pennsylvania library laws, this includes disclosure or distribution of information upon request by a parent or guardian for a child's library records or a family member for another family member's library records.

Only the BCFL Chief Executive Officer (CEO) or the CEO's designee is authorized to comply with requests for library user information from law enforcement. Such requests must be submitted in the form of a court order, subpoena, search warrant or Foreign Intelligence Surveillance Act (FISA) order. All such requests must be submitted to BCFL's administrative offices for consideration, review, and fulfillment.

Statistical Reporting

Library user information may be compiled by BCFL for internal purposes or statistical reporting to federal, state, and local public or private funding bodies. This aggregate, summary data is stripped of personally identifying information at the time of collection or submission.

Purging of Data

A library user may request deletion of this data or other information from the user's records. BCFL, in turn, will make every effort to remove all identifiable personal information from our systems. BCFL may retain deleted information on our servers for a limited period as required for system maintenance, security monitoring, and troubleshooting. Deleted information is not easily recovered or searchable and is subject to regular purging. Once BCFL has deleted information at a library user's request, BCFL will not be able to recover it for the user.

Integrity and Security of Information

BCFL takes reasonable measures to assure the privacy and integrity of library user records. BCFL utilizes appropriate technology to protect the security of personally identifiable information while it is in BCFL's custody.

BCFL does not engage in practices that may place personally identifiable information accessible to the public or unauthorized persons or entities.

BCFL periodically reviews its systems and practices for privacy concerns to address and respond to any issues or threats that may compromise library user records and their confidentiality.

Library users can receive assistance with privacy settings by speaking with a library staff member.

Library users may comment on this policy or appeal any actions taken by library staff to enforce this policy by submitting their concern in writing to the Bucks County Free Library Board of Directors, 150 South Pine Street, Doylestown, PA 18901-4932 or via the comment form at <https://buckslib.org/contact-board>.

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