

# Customer Privacy Policy

<b>Policy Number:</b>	<b>OP-008</b>
<b>Policy Category:</b>	Operations
<b>Approved by:</b>	OPL Board
<b>Accountability:</b>	CEO or Designate
<b>Approval Date:</b>	<b>June 24, 2021</b>
<b>Effective date:</b>	<b>June 25, 2021</b>
<b>Next Review Date:</b>	<b>June 2025</b>
<b>Supersedes:</b>	Confidentiality of Customer Records Policy

## Purpose:

To ensure that Oakville Public Library (OPL) protects the personal information and privacy of its customers in compliance with the Municipal Freedom of Information and Protection of Privacy Act, R.S.O 1990, Chapter M.56 (MFIPPA) and Canada's Anti-Spam Legislation (CASL).

## Scope:

This policy applies to all personal information provided by customers to OPL in writing, electronically or in-person.

## Definitions:

**Personal information:** identifiable information about an individual such as name, phone number, address, email, date of birth, financial transaction, etc. Exceptions are defined in the MFIPPA.

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

## Policy Statement:

In the course of collecting personal information to conduct its business, the OPL will comply with the Municipal Freedom of Information and Protection of Privacy Act, R.S.O 1990, Chapter M.56 (MFIPPA) and Canada's Anti-Spam Legislation (CASL).

The library collects personal information under the authority of the Municipal Freedom of Information and Protection of Privacy Act for the purpose of conducting the library's business which may include, but is not limited to: fines and fees, holds, overdue and renewal notices, room rentals, programs, general communication and fundraising.

The library will clearly state the purpose for collecting any personal information before such information is collected and will obtain consent for that use.

Obtaining a library card implies the individual's consent to authorize the library to collect personal information for the purpose of conducting the library's business which may include fines and fees, holds, overdue and renewal notices.

Obtaining a library card implies the individual's consent to authorize the library to send electronic notifications regarding personal borrowing and transaction activities using their preferred method. The library will also use electronic means to promote services, programs or share information. The library will seek the individual's consent before sending promotional electronic messages. The library will provide options to individuals to easily unsubscribe from promotional messages change their preferences at any time.

The possession of a physical library card or access to the card in digital format implies consent for the holder to pay fines or pick up materials on behalf of the card owner, but does not allow access to any library account information such as materials checked out on the card.

Personal information shall be collected using only legal and lawful means and its collection, use and storage will be limited to that which is necessary to conduct business for the purposes identified by the library.

#### **Use and disclosure:**

Personal information shall 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 law.

Library account information can be shared only with the account holder, or with the person who has lawful custody of the individual for a person who is less than 16 years of age, or with someone holding Power of Attorney for the specified individual.

Personal information may be shared with agencies and companies working within the scope of their duties on behalf of the library and in compliance with this policy.

Any disclosure of personal information to law enforcement officials must be approved by the CEO. Exceptions can be made in compassionate circumstances where the manager in charge may disclose information in the case of a missing person where time is of essence.

#### **Retention:**

The library retains records of library transactions identifying specific individual's use of the library for as long as the cardholder remains active. Inactive accounts with no outstanding balance are deleted after 2 years.

#### **Accuracy:**

Every effort will be made to maintain customer information complete and up-to-date. Customers are responsible for identifying changes in personal information such as name, address or contact information.

Personal information shall be protected from unauthorized access by safeguards that are appropriate for the sensitivity of the information collected. Customers should report immediately any lost or stolen library card to reduce the risk of potential unauthorized access to their records and protect their information.

The library will ensure that its Privacy Policy is enforced by all library staff members as well as third party organizations or agencies that have legitimate access to such information in support of conducting the library's business.

Questions regarding the collection and use of personal information can be directed to: CEO, Oakville Public Library.

The library will apply Privacy by Design principles in technology, business practices and physical design to protect customer privacy when conducting library business to provide services to the public.

## **References:**

Municipal Freedom of Information and Protection of Privacy Act, R.S.O 1990, Chapter M.56 (MFIPPA)

Canada's Anti-Spam Legislation (CASL).