

## Policy 701: Library Privacy Policy

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It is the policy of the Salem-South Lyon District Library (SSLDL) Library Board, administration and staff to preserve the confidentiality of all library patron records and related patron information to the fullest extent permitted by law. The Library patron records of the SSLDL shall be released or disclosed only to comply with subpoenas and search warrants listed in the Library Procedure Manual and applicable law including the Michigan Library Privacy Act. MCL 397.601 *et seq.*

All library patron records and related patron information shall be treated by the staff of the SSLDL as confidential, including name, address, telephone number, or any other information provided on library patron records that personally identifies a library patron. The SSLDL may only use library patron records for library transactions and to distribute library-related information to registered library patrons.

1. Library patrons 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. Library records are retained in accordance with state law to satisfy administrative, legal, fiscal and historical needs.<sup>1</sup>
2. Patron registration information is exempted from disclosure in the Michigan Freedom of Information Act.<sup>2</sup>
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, 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. Library cards contain a barcode number and associated PIN number.
  - b. Internet access: No individual information is collected.
  - 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, and ages of minors.
  - d. 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. See Policy 422.
  - e. Meeting room applications
    - i. The Library requires an application for the use of its meeting rooms (see Meeting Room Use Procedure) in order to verify eligibility, designate a responsible party and to provide a point of contact. It includes name, organization, address, phone number, and email address.
  - f. Credit card transactions

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<sup>1</sup> MCL 399.5 *et seq.* and 750.491 *et seq.* General Schedule #17 Michigan Public Libraries.

<sup>2</sup> MCLA 15.243 *et seq.* Freedom of Information Act

- i. In order to process credit card transactions in person, the Library will transmit the following information: credit card holder's name, credit card number, credit card security code, credit card type and credit card expiration date.
  - ii. Online credit card transactions will transmit the following information: credit card holder's name, address, phone number, email address, credit card number, credit card type and credit card expiration date
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.<sup>3</sup> 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.
  - d. The Library may use records to distribute library-related information to registered borrowers.
  - e. The Library may use information collected in aggregate for statistical analysis and planning purposes.
  - f. The Library Director is the designated custodian of records.
  - g. If the Library requests the assistance of a law enforcement officer, and the Library Director determines that records produced by a surveillance device may assist the law enforcement officer to render the requested assistance, the Library may disclose the records to the law enforcement officer upon request.
  - h. Any other disclosure of library records is prohibited unless required by law.

#### Social Security Number Privacy for Employees/Patrons

1. Patrons
  - a. The Library does not collect social security numbers from patrons.
2. Employees
  - a. As required by MCL 445.84, the Salem-South Lyon District Library adopts this social security number privacy policy.
  - b. The Salem-South Lyon District Library will ensure to the extent practicable the confidentiality of social security numbers held by the Library. Social security numbers will not be disclosed to those outside of the Library, except as authorized by law. Access to information or documents that contain social security numbers will be limited to those requiring access.
  - c. More than four sequential digits of the social security number will not be publicly displayed, used as an account number, password, or identifier, or included in or on any document sent outside the Salem-South Lyon District Library, except as authorized by law. Any documents containing social security numbers are to be shredded before disposal.
  - d. Violations of this policy may result in discipline (see Policy 207), up to and including dismissal. Employees who violate the Social Security Number Privacy Act, 454 Pa 2004, MCL 445.81-445.87, also may be subject to fines and imprisonment.<sup>4</sup>

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<sup>3</sup> MLC 397.601 et seq. Michigan Library Privacy Act

<sup>4</sup> Michigan Library Privacy Act, 1982 Public Act 455, MCL 397.601-397.605. Library Records protected by the Michigan Library Privacy Act are exempt from disclosure under the Freedom of Information Act (MCL 397.603 and MCL 15.243[d]) Social Security Number Privacy Act, 454 Pa 2004, MCL 445.81-445.87