

## Warminster Township Free Library

### **PRIVACY AND CONFIDENTIALITY OF LIBRARY RECORDS POLICY**

NOTE: Most of this policy is borrowed from and in agreement with the corresponding policy of our partner organization, the Bucks County Free Library.

#### **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 Warminster Township Free Library (WTFL) is committed to protecting each individual user's privacy and maintaining confidentiality in how we do business. This policy explains the steps the WTFL--and its partner institution Bucks County Free Library (BCFL)--takes to respect and protect a library user's privacy when using library resources, what information WTFL and BCFL collect from library users, and how the libraries deal with that personally identifiable information collected.

WTFL and BCFL are governed by the Pennsylvania Library Code, which states, in relevant part, that: "Records of [WTFL] 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 WTFL is used solely for the purpose of providing library services, such as patron access to physical resources, electronic resources, WTFL's facilities, and assistance from WTFL 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.

#### **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 WTFL with their name, address, phone number, date of birth, and e-mail address. This information is required by WTFL for a library patron to become eligible to borrow materials from WTFL and use other WTFL resources. This information is, in turn, maintained in the user's records and relied upon when WTFL 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

WTFL and BCFL use an Integrated Library System (ILS) to manage their catalog, circulation records, and user records. The ILS stores personal data collected from WTFL library users. It also maintains records of what items users borrow, the holds they place, and bills they may incur. Specifically, WTFL'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.

WTFL 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 WTFL computers and printers, WTFL and BCFL use computer access and reservation control software to manage the computer signups and printing. When a user logs into a WTFL 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 WTFL is not responsible for the privacy practices or security of outside, third-party websites accessed by library patrons on WTFL computers. WTFL shall have no liability for direct, indirect, or consequential damages related to the use of information accessed on the internet by library users from WTFL 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 WTFL website pages may contain links to external, third-party websites, services or content that are not maintained or controlled by WTFL. 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, WTFL 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.

### **How Information May be Used and Shared**

WTFL and 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**

WTFL 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 WTFL's ILS.

### **Credit Card Payments**

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

### **Donation Records**

WTFL 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. WTFL will respect and follow donor wishes regarding if and how they prefer to receive library communications.

## Email Announcements

Library users may opt to receive emails 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 emails at any time by clicking the unsubscribe link at the bottom of an email. Information collected 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 WTFL 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 WTFL'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 WTFL has limited ability to protect the privacy of this information once it is outside WTFL'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.

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

WTFL 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 WTFL Director or the Manager-in-Charge 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, or court-ordered judicial warrant. WTFL follows the guidance of the American Library Association in the scenario of an information request from law enforcement found here: [How to Respond to Law Enforcement Requests for Library Records and User Information: Suggested Guidelines | ALA](#).

## Statistical Reporting

Library user information may be compiled by WTFL 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. WTFL, in turn, will make every effort to remove all identifiable personal information from our systems. WTFL 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 WTFL has deleted information at a library user's request, WTFL will not be able to recover it for the user.

## **Integrity and Security of Information**

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

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

WTFL 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 Warminster Township Free Library at 1076 Emma Ln, Warminster, PA 18976.

Adopted by the Warminster Township Advisory Board on March 12, 2025.