



## CONFIDENTIALITY OF PATRON AND CIRCULATION RECORDS POLICY

### **Purpose**

Protecting patron privacy and confidentiality has long been an integral part of the mission of libraries. Longview Public Library (LPL) strives to protect each library patron's right to privacy and confidentiality. The following policy addresses how LPL protects patron privacy and maintains the confidentiality of patron records. The LPL Director is responsible for establishing the procedures necessary to carry out this policy.

The Washington State Open Public Records Law requires public agencies to provide records on request; RCW 42.56.070. There is an exemption to this law for certain library records; RCW 42.56.310.

### **Personally Identifiable Information Collected by LPL**

LPL collects only enough information from our users to conduct the business of lending library materials. This information includes

- Name
- Date of birth
- Phone number
- Address
- Email address
- Unique library card number
- Signature
- Responsible adult (minors only)

### **Third Parties**

LPL does not share or sell our patrons' information to any third-party sources. We share our patron's information with our Integrated Library Software vendor and use their cloud-based server for storage of patron records. LPL may share patron data with a third-party vendor for assistance in collecting library materials or resolving delinquent accounts. LPL enters into agreements with third-party vendors and partners to provide online services, digital collections, streaming media content, electronic newsletters and to improve our website.

When using some of these services, library patrons may also connect with social networks and other users of these services. Third party services may gather and disclose information, including: personally identifiable information knowingly provided, including registering for a site, providing feedback and suggestions, requesting information, or creating shared content.

Other information that could be used for identification include: IP address, search history, location-based data, and device ID. Non-personally identifiable information, such as ad views, analytics, browser information (type and language), cookie data, date/time of a request, demographic data, hardware/software type, interaction data, server domains, page views and web pages visited immediately prior to visiting a third-party site. Other data that third party services may collect as described in the vendor's privacy policy and terms of use. For more information

on the specific types of data that may be gathered and disclosed by each third-party service, please refer to the Terms of Use and Privacy Policies for the online services you use.

Library security cameras are under the control of the City of Longview. Requests for footage must be made by submitting a Police report or a FOIA request to the City Clerk.

## **External Websites**

LPL's website also contains links to external websites not maintained by LPL and is not responsible for patron privacy when users visit those websites. Once users link to another website, they are no longer subject to LPL's Confidentiality of Patron Information policy, but the privacy policy or statement, if any, of the third party's website.

## **Policy**

1. Patron registration information and circulation information shall be considered confidential and will not be provided to any other person, such as spouses and law enforcement officers, without court order. LPL will not make library records available to any agency of state, federal, or local government unless a subpoena, warrant, court order or other investigatory document is issued by a court of competent jurisdiction, showing good cause and in proper form. LPL has trained all library staff to refer any law enforcement inquiries to the Director. Exceptions for parents/guardians noted in (3) below.
2. Customers requesting information about their own cards may be given the information by showing any official documents (examples are: Driver's license, Government issued ID, Passport, Credit Card with Photo, Shopping Club Card with photo, Military ID, Work ID) to confirm photo identification, or by verifying information (examples are: rent agreement, lease agreement, tax documents, medical records, government / tribal issued documents, school records, pay stub, bank or credit card statement) in their library record.
3. Parents/guardians may be given the titles of books their minor children have borrowed providing they have the child's library card or can provide a combination of information and documentation. Any combination of official documents may be provided to confirm photo identification and date of birth for the parent. A minor's address and phone number are considered confidential and are not to be provided to anyone including a parent or guardian. Parents may be told if their child is registered. If for any reason, verification of correct name must be done using the address, the parent must give the address; staff shall not reveal it. RCW 26.28.010 defines age of majority as eighteen years.
4. Information from customer files may be used for library related research and to notify the user about enhanced library services to meet their needs.
5. The Library may from time-to-time use customer addresses and emails on behalf of its support organizations (Friends of the Library and Longview Library Foundation) to announce issues and events that are of interest to library patrons and/or invite patrons to financially support those organizations. The Library will not give the list to the organizations, but instead will send a message on their behalf.
6. Library staff will not provide information over the phone confirming that a person is in the Library. Staff will suggest that the person (law enforcement, parent / guardian, truancy officer), look around the building. Staff will pass on a message from the caller to call that person they describe if staff encounters them.

## **Records disposal**

Library records containing personally identifiable information will be disposed of unless needed for efficient operation of the library, public records retention requirements, system backups, or other reasons related to effectively managing library resources or providing services.

## **Enforcement and Redress**

If you have a question, concern, or complaint about our handling of your personally identifiable information or this policy you may file written comments with the Director. Staff will respond in a timely manner and may conduct an investigation or review of practices and procedures. The Director is custodian of library records and is authorized to receive or comply with public records requests or inquiries from law enforcement officers. The Director may delegate this authority to designated members of the Library Leadership Team. The Director confers with the City Attorney before determining the proper response to any request for records.

**Recommended for approval: Jacob Cole, Library Director 12/12/2022**

**Approved by: Library Trustee Board 12/12/2022**