

## Policy Statement

To protect customers' rights of free speech, free thought and free association, the library will maintain confidentiality of library customer records to the fullest extent permitted by law.

---

## Regulations

1. This policy is based on the exemption of the Freedom of Information Act (FOIA) MCL 15.243 Sec. 13.(1)(a) which provides:  
“(1) A public body may exempt from disclosure as a public record under this act: (a) information of a personal nature where the public disclosure of the information would constitute a clearly unwarranted invasion of the individual’s privacy.”
2. Employees of the Comstock Township Library will not disclose information of a personal nature regarding library patrons to any individual or to any agency, state, federal, or local government if “the public disclosure of the information would constitute a clearly unwarranted invasion of an individual’s privacy.”
3. Information deemed to be unwarranted includes, but is not limited to the contents of registration and circulation records including patron names, addresses, telephone numbers, marital status, family information, number of books a specific patron checked out, number of years a specific patron has had a library card, whether a specific patron has had a library card, how often a specific patron uses the library or any other information which identifies the library activities of a specific patron.
4. Non-identifying statistical data may be released pursuant to the FOIA exemption.
5. Employees of Comstock Township Library will comply with the Michigan Library Privacy Act (MCL 397.601 – 397.605).
6. The requestor of unwarranted information will be furnished with a written denial within five business days after the FOIA request has been made.

---

Approved: March 2016  
Comstock Township Library Board of Trustees