

Policy Statement

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

Regulations

1. 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.
2. 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.
3. Information the library may gather and retain about 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, email address, driver's license number, date of birth, items currently checked out, fines owed, paid, or waived, current hold requests, and informational notes related to library card account matters.
 - iii. Radio frequency identification (RFID) tags in library materials include item barcode number and security gate on/off bit.
 - B. Internet access
 - i. Information is collected to allow automated management of the library's public computer resources including barcode number, computer time used for the day, allowed computer time, and printing cost balance.
 - ii. Computer stations may accumulate browser histories, cookies, and downloaded files and favorites during a user's session. Any record of browsing history, activities, and personally identifiable information is removed upon the end of a user's public computer session.
 - C. Web-based events calendar
 - i. Information collected to manage library program registration may include name, phone number, email address, grade, age, and library card number.

- D. Web-based reading application
 - i. Information collected to manage online reading programs may include name, phone number, email address, age, school, grade, and books or time read.
- E. Security camera recordings
 - i. The library records people using the library and building to increase security and provide a means of identification should an incident occur.
- F. Meeting room applications
 - i. The library requires an application for the use of its meeting rooms (*see Meeting Room Policy*) in order to verify eligibility, designate a responsible party, and to provide a point of contact. Applications include name, organization, phone number or email address, and library card number.
- G. Credit card transactions
 - i. The library uses a third-party application to process credit card transactions. No credit card holder information is retained by the library.

4. Library patron registration information is exempted from disclosure in the Michigan Freedom of Information Act¹.

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 user². 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 or materials recovery agency.
- D. Records may be shared with a third party to conduct library business unless a customer chooses to opt out.
- E. The library may use records to distribute library-related information to registered borrowers.
- F. The library may use information collected in aggregate for statistical analysis and planning purposes.
- G. The library director is the designated custodian of records.

¹ MCL 15.243 Freedom of Information Act

² MCL 397.601 Library Privacy Act

- H. The library director, or a person designated by the library director, may disclose security camera footage to a law enforcement officer so long as it does not include images of any activity, document, or record that identifies a person as having requested or lawfully obtained services or materials from the library.
- I. Any other disclosure of library records is prohibited unless required by law.

Approved: March 2016, Revised: November 14, 2022
Comstock Township Library Board of Trustees