

## Privacy Policy

### I. Purpose

- a. The New Haven Free Public Library (the "Library") is committed to protecting the personal information of all who use its services and resources. This policy spells out what information the Library collects and how that information is used and safeguarded.

### II. Key Definitions

- a. Personally identifiable information ("PII") is the limited library user data collected and retained by the Library to provide or improve its services. PII includes an individual's name, address, age, telephone number, and e-mail address. That information is obtained only with the consent of the individual. Materials may be provided by the Library or other non-profit organizations, community groups, individuals, educational institutions, or governmental agencies.
- b. This policy applies to all PII as defined above. It also applies to Library resources with whom users may consult and all Library materials borrowed by patrons. Additionally, it applies to patrons and members of the public who use the Library's computers and computer network.

### III. Responsibilities of the Library

- a. The City Librarian is responsible for working with staff and vendors to develop and apply effective procedures to maintain the security of all PII in the Library's custody and to protect such information from unwanted disclosure.
- b. The Library is further responsible for ensuring that all vendors who have access to the Library's PII have similar privacy policies in effect prior to entering into a contract or license with the Library. Such vendors include but are not limited to, those who host or support the Library's databases.
- c. The Library's website contains links to websites it does not maintain. The Library is not responsible for the privacy practices of those or any third-party websites. All individuals who visit third-party websites and informational databases which are not maintained exclusively by the Library are encouraged to become familiar with their privacy practices to the extent possible, and to be mindful of privacy concerns, especially if those sites ask for PII.

### IV. Notices for the Public

- a. All users are advised that such records will not be made available to any agency of the local, state, or federal government except pursuant to such process, order, or subpoena as may be authorized under the authority of, and pursuant to, local, state, or federal law relating to criminal, civil, or administrative procedures or legislative investigatory power.
- b. Users of Internet browsing software should be aware that the history of sites visited on the web is not private or secure.
- c. Our public computers include Deep Freeze, a service that automatically deletes user content when the computer session is ended.
- d. Information may be accessed on the Library's computers if a constituent does not log-out of online accounts or log-off from their library computer session when they are finished using the computer. The Library is not responsible for protecting the privacy of personal information left accessible by patrons using public computers or internet.
- e. People in a public place, such as when physically in a public library, on library property, or attending a library event should not have an expectation of privacy. A person's identity as they enter a public building is not protected by this policy or by law. The New Haven Free Public

Library does have video surveillance on its premises and may use this information to investigate illegal activity within the Library without the requirement of a subpoena or court order.

**V. Procedures:**

- a. PII Security: The Library will take all reasonable steps to prevent the unauthorized release of the PII it retains. However, the Library cannot ensure the integrity of the Library's computers and computer network, both wired and wireless. Those who use the Library's computers should take all appropriate precautions when accessing any shared computer or public network.
- b. Data Review and Retention: The Library does not retain PII not required for its operation. Outdated and unneeded PII is purged from the Library's systems on a regular basis consistent with legally required retention schedules when such schedules exist.
- c. Data Storage and Sharing: PII given to the Library for the purpose of borrowing materials is stored on a server managed by the Library and shared with other libraries at the user's request for the purpose of reciprocal borrowing between libraries (i.e., Interlibrary Loan requests).
- d. Release of Information: Any law enforcement request for PII shall be immediately referred to the City Librarian or their designee in the event of the City Librarian's absence. No PII shall be released until legal authorization such as a subpoena or court order is presented, and the City Librarian has consulted with legal counsel to determine that the request is valid.
- e. Opt-in for Email Communication: An email address is not required information when signing up for a library card. If a user chooses to share an email address on a library card application, that user is consenting to receive emails related to their library circulation records. They may opt out of such communication at any later date. Similarly, by signing up to receive emails about Library news and programs, a user is consenting to receive those marketing emails. Contact and unsubscribe information is included on all marketing emails sent by the Library.

**VI. Applicable State Law**

- a. Per Connecticut General Statute, Chapter 190, Section 11-25(b), library records are confidential, and the Library shall not disclose PII regarding its users to any third parties unless the Library is legally bound or compelled to do so, or unless the third party is a vendor contracted to provide library services or library network services. In accordance with a memo from the State Attorney General's office dated September 16, 1993, parents or legal guardians may have access to circulation records of minor children.

*Approved by NHFPL Board of Directors, June 2023.*