



# AVON

FREE PUBLIC LIBRARY

## Privacy Policy

### Purpose:

The Avon 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.

### Key Definitions:

Personally identifiable information ("PII") is the limited library user data collected and retained by the Library in order to provide or improve its services. PII includes an individual's name, address, age, telephone number, and email address. That information is obtained only with the consent of the individual.

### Scope:

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.

### Roles and Responsibilities

The Library Director 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.

The Director 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.

The Library's website contains links to websites it does not maintain. The Library is not responsible for the privacy practices of those websites, and all who visit them 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.

### Procedures:

- 1. PII Security:** The Library will take all reasonable steps to prevent the unauthorized release of the PII it retains. Those who use Library's computers should take all appropriate precautions when accessing any shared computer or public network, as referenced in the Library's [Internet Use Policy](#).

- 2. 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 Outdated and unneeded PII is purged from the Library's systems on a regular basis consistent with legally required retention schedules when such schedules exist.
- 3. Data Storage and Sharing:** PII given to the Library for the purpose of borrowing materials is stored on a server managed by our library consortium and shared with other consortium members for the purpose of reciprocal borrowing between libraries.
- 4. Release of Information:** Any law enforcement request for PII shall be immediately referred to the Library Director or his/her designee in the event of the Director's absence. No PII shall be released until legal authorization such as a subpoena or court order is presented, and the Director consults with legal counsel to determine if the request is valid.
- 5. 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.

**Applicable State Law:**

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 with 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.

**Location:**

This policy is housed on the Avon Free Public Library Website:

<https://www.avonctlibrary.info/policies/>

A copy is maintained in the Library's Administrative Office.

Adopted by the Library Board of Directors: October 20, 2015

Revised: November 17, 2020

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