

**TITLE:** Privacy and Confidentiality of Customer Information

**POLICY:** B-2005

**COMMITTEE:** Governance and Nomination  
**TOPIC:** Foundation of Service

**PASSED:** December 1, 2015  
**AMENDED:** February 21, 2019  
**REVIEW PERIOD:** As required

The Board of the Edmonton Public Library (EPL) is committed to the confidentiality of customer use of its facilities, services, collections and website. The collection, use, disclosure and storage of personal information are undertaken in accordance with the Alberta Freedom of Information and Protection of Privacy Act and the Canadian Library Association’s Statement on Intellectual Freedom.

The Library collects and stores personal information for:

- the provision of library services, including:
  - circulation of library material;
  - public internet use;
  - what is needed to manage, assess, deliver and communicate library services;
- and, fundraising purposes.

The Library does not sell, give away or lease personal information stored in its database. Personal information is collected with the express consent of the user. The Library will not disclose a user’s personal information, to a third party without the individual’s consent or subject to the following:

- In response to a subpoena, court order or a specific written request from a law enforcement agency to assist in an investigation or as required by law.
- There are reasonable grounds to believe that the disclosure:
  - Will avert or minimize an imminent danger to the health or safety of any person.
  - To a law enforcement agency, to an organization providing services to a minor, or to another public body that is in the best interests of the minor.
- In keeping with established procedures for recovering Library property, unpaid fees, fines or other charges (e.g. collection agency).
- To respect the rights of parents and guardians respecting minors.
- For the purpose of contacting next of kin or emergency response personnel in the case of an emergency.
- To ensure safety and security in a shared facility.
- When a formal information sharing agreement has been signed.

The above provisions apply to employees, volunteers and persons working under contract to the EPL who handle personal information or have access to information systems or facilities where such information is handled or stored. Staff may look up personal information of individual customers only if there is a business reason to do so, such as providing or managing access to library services.

## **Definitions**

*Personal Information:* Recorded information about an identifiable person, including but not limited to, name, membership number, email address, home or business address, phone number, date/year of birth, circulation records (materials checked out or requested, fines waived or paid, holds placed), websites visited, number or character of information questions.

*Law Enforcement Agency:* Municipal or provincial police service, RCMP, Alberta Justice.

## **Legislative and Policy Authorities**

- [Alberta Libraries Act](#)
- [Child, Youth and Family Enhancement Act](#)
- [Freedom of Information and Protection of Privacy Act](#)
- [Canada's Anti-Spam Legislation \(CASL\)](#)

## **Related Board Policies**

- [Intellectual Freedom, B-2012](#)
- [Public Internet Access, B-2010](#)