

TITLE: Privacy and Confidentiality of Personal Information

POLICY: B-2005

COMMITTEE: Governance and Nomination
TOPIC: Foundation of Service

PASSED: December 1, 2015
AMENDED: November 9, 2021
REVIEW PERIOD: As required

The Edmonton Public Library is committed to protecting personal privacy. Individuals have the right to privacy as provided for in the *Freedom of Information and Protection of Privacy Act* (FOIP). Any collection, use or disclosure of personal information by EPL is done in accordance with FOIP and the [Canadian Federation of Library Association's Statement on Intellectual Freedom and Libraries](#).

This policy must be followed by EPL employees and volunteers and by any person working under contract to EPL who has access to the personal information of customers.

Additional information about the collection, use and disclosure of personal information can be found in the related policies referred to in this policy, on the [Digital Privacy](#) section of EPL's website at and by accessing information about EPL's [Personal Information Banks](#).

Collection, Use and Disclosure of Personal Information

EPL collects the personal information of customers in accordance with FOIP. Examples of when information will be collected include, but are not limited to:

- when customers use EPL's digital resources
- when customers sign up for a library card
- when customers use EPL's makerspaces, meeting rooms, computers and other equipment ;(i.e. gaming stations)
- through EPL's surveillance cameras located in branches
- when individuals make donations to EPL
- when otherwise allowed by law

EPL collects and uses personal information for the following purposes:

- the provision, delivery, management and communication of library services including but not limited to issuing library cards, purchasing and circulating materials, dealing with customer complaints, collecting fees, facility booking requests, and issuing suspensions.
- evaluating, planning and improving services
- library fundraising

EPL does not sell, give away or lease personal information of customers to third parties. EPL will not disclose customer personal information to a third party without the individual's consent except in the following circumstances:

- in response to a subpoena, court order or a specific written request from a law enforcement agency to assist in an investigation
- when there are reasonable grounds to believe that the disclosure will avert or minimize an imminent danger to the health or safety of any person, or a risk of harm to the health or safety of a minor
- in accordance with established EPL procedures for collecting EPL property, unpaid fees or other charges
- 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
- when a formal information sharing agreement is in place between EPL and a third party
- otherwise as allowed or required by law

Protection of Personal Information

EPL uses reasonable measures to protect against the risks of unauthorized access, collection, use, disclosure or disposal of personal information. These measures include technological, physical, administrative and operational safeguards that are appropriate to the nature and format of the personal information.

Retention

EPL will take reasonable steps to ensure that the personal information it holds is accurate, complete and up-to-date.

EPL will retain the personal information it collects for as long as it is needed for the purpose for which it was collected. Once it is no longer required it will be destroyed.

Access to Personal Information

Individuals may access the personal information that EPL holds about them by completing a [Request for Information form](#). Individuals will be asked to verify their identity prior to being provided access to their personal information.

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), images, websites visited, number or character of information questions.

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

Related Policies and Information

- [Alberta Libraries Act](#)
- [Canada's Anti-Spam Legislation \(CASL\)](#)
- [Canadian Federation of Library Association's Statement on Intellectual Freedom and Libraries](#)
- [Child, Youth and Family Enhancement Act](#)
- [Freedom of Information and Protection of Privacy Act](#)
- [Intellectual Freedom, B-2012](#)
- [Public Internet Access, B-2010](#)
- [Records Management, B-2009](#)