

Fingal Libraries - PRIVACY STATEMENT:

Who We Are?

Local Authority Fingal County Council

Local Authority	Fingal County Council
Department	Community
Section/Service	Libraries

Why do we have a Privacy Statement?

Fingal County Council has created this privacy statement in order to demonstrate our firm commitment to privacy and to assure you that in all your dealings with Fingal County Council that we will ensure the security of the data you provide to us.

Fingal County Council creates, collects and processes a significant amount of personal data in various multiple formats on a daily basis. Fingal County Council's commitment is that the personal data you may be required to supply to us is:

- Obtained lawfully, fairly and in a transparent manner
- Obtained for only specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary for the purpose for which it was obtained
- Recorded, stored accurately and securely and where necessary kept up to date
- Kept only for as long as is necessary for the purposes for which it was obtained
- Kept in a form which permits identification of the data subject
- Processed only in a manner that ensures the appropriate security of the personal data including protection against unauthorised or unlawful processing

What personal data do we collect?

In order to process your application for engaging with the Fingal Library resources provided we collect information in the following ways:

Information you give us, about you when you become a member of Fingal libraries or if you engage via our websites. We only collect information which is necessary, relevant and adequate for the purpose you are providing it for.

Information we get from your use of our library services or library service providers. We collect information about you when you use Fingal libraries website, when you borrow, return, reserve books and other items either through the Library Management System (LMS) website, either directly or through a library staff member.

The information we process/require in the LMS includes some or all of the following:

1. Name (First names and last name)
2. Address including Eircode

3. Year of birth
4. Gender
5. Email address
6. Mobile number
7. Home library
8. Library Card number
9. Pin
10. Items currently on loan to you
11. Inter library loans to you
12. Items Currently on hold for you
13. Items you have told us that you have returned
14. Fines owed
15. Language preference
16. How you would like us to contact you
17. Notes

In addition, individual library branches may also collect the following personal data.

18. Any information with correspondence or emails that you sent directly to our libraries/offices.
19. Personal data, including your email address if you have signed up to receive monthly emails from your individual branch.

Why do we collect it?

Legal Obligation Under the Public Library Act 1947 we are required to request this data in order to provide this service.

What do we do with it?

Fingal libraries will only process information that is necessary for the purpose for which it has been collected.

If you do not provide us with the information we require, relevant and appropriate to the reason for which we request it, this may prevent you from fully availing of our services.

We may use the personal data we gather for any or all of the following purposes.

Purpose	Description	Lawful basis for processing
Provision of a library service: library service administration	We record personal data when a library member registers to become a member of a library service and as identification when you contact us	The processing is necessary for the performance of a statutory duty.

Provision of a library service – library administration	We record item(s) and date(s) when a library member borrows an item Fingal libraries and calculate return dates. We record your hold items, overdue items and fines. Library members may also opt to receive messages prior to the return date to enable them to return or renew the item.	The processing is necessary for the performance of a statutory duty.
Provision of library service – author information	We process personal information about the authors of items loaned in order to accumulate data for the calculations of the Public Lending Remuneration Scheme	The processing is necessary for the performance of a statutory duty.
Provision of a library service – related online library member services	We provide access to the following third-party online services through Fingal website and through the Libraries Ireland website managed by Libraries Unit in the Local Government Management Agency: Newspapers Magazines Ebooks eAudio Books Language Learning Learning	The library member has given explicit consent to the this-party to the processing Your Data will not be passed to any third-party for their own independent marketing purpose.

How we work with the Libraries Unit in the Local Government Management Agency and other local authority public library services.

The Local Government Agency (LGMA) is the data controller of your personal data held within the Library Management System (LMS) along with Fingal County Council. The LMS system is provided and hosted by Innovative Interfaces Global LTD and they are our data processor. Innovative Interfaces Global LTD is a global provider of library management systems.

Dublin City Public Libraries Information Technology team support the LGMA and Fingal libraries in providing LMS

One of the advantages of a national library service is that you may search and reserve a library item from a different local authority public library service. If you do then they will be permitted to access your personal information for the purpose listed above.

The Privacy statement for the LGMA can be found

<http://www.librariesireland.ie/wp-content/uploads/2018/08/Libraries-Ireland-Privacy-Statement.pdf>

The LGMA and Fingal Libraries has arranged for library members to access online resources provided by third parties.

These third parties are data controllers in their own right. They will collect personal data about you including your library card number for their own purposes. Fingal Libraries and the LGMA (Libraries Development) do not share your personal data with these third parties. We do allow them to check certain information items against the LMS system in order to confirm their validity. You should refer to their privacy statements for information about what they do with your data and what rights are available to you. Fingal libraries and the LGMA (Libraries Development) produce aggregate reports on the usage of these systems.

Fingal libraries also use a small number of third parties to provide information technology and other supports. These third parties are our data processors. We ensure that any third-party data processors who handle your information comply with data protection legislation and protect your information just as we do. We only disclose personal information that is necessary for them to provide the service that they are undertaking on our behalf. We anonymise your information or use aggregated none specific data sets where ever possible. Your data will not be passed to any third-party for their own independent marketing purposes.

How do we protect it?

The security of your personal information is important to us. The records we keep about you are secure and confidential within the Council. The Council has a range of procedures, policies and systems to ensure that access to your data is controlled appropriately. These include:

- Encryption, meaning that data cannot be read without special knowledge, such as a password.
- Controlled access to systems and networks, which allows us restrict access to your data to those members of staff who have approval to do so.
- Training for staff in data protection policies and procedures.

Do we share it?

Your information will not be shared with other organisations unless we have your consent or there is a legal basis for doing so.

Your Data will not be passed to any third-party for their own independent marketing purpose.

How long do we keep it?

The data we collect and the records we create based on that data are subject to a Retention Schedule, which outlines how long we will hold the data, and what we will do with it after the period of retention has expired.

A copy of our Record Retention Policy can be accessed at:

<http://fingal.ie/media/Record%20Management%20Policy.pdf>

The National Retention Policy can be found at:

http://fingal.ie/media/2002_national_retention_policy_for_local_authority_records_2.pdf

CCTV

There are CCTV in place in the library buildings, please see Fingal County Council Policy regarding CCTV at https://www.fingal.ie/sites/default/files/2019-07/fingal_cctv_policy.pdf

Your Rights

You have the right to request access to personal data held about you, obtain confirmation as to whether data concerning you exists, be informed of the content and source of the data and check its accuracy. In addition, if the data held by us is found to be inaccurate you have the right to change, remove, block, or object to the use of personal data held by Fingal County Council. In certain circumstances blocking access to data may delay or remove access to a service where the data is required by law or for essential purposes related to delivery of a service to you. Please note that to help protect your privacy; we take steps to verify your identity before granting access to personal data.

To exercise these rights you should take the following steps:

To request personal data held by Fingal County Council must be made in writing by post or email to:
Data Protection Officer, Corporate Affairs & Governance Department, Fingal County Council, Main Street, Swords, Co. Dublin
Email: Data.Officer@fingalcoco.ie
Tel: 01 8905162

Complaints procedure

If you are not satisfied with the outcome of the response you received from Fingal County Council in relation to your request, then you are entitled to make a complaint to the Data Protection Commissioner who may investigate the matter for you.

The Data Protection Commissioner's website is www.dataprotection.ie or you can contact their Office at:

Lo Call Number: 1890 252 231

E-mail: info@dataprotection.ie

Postal Address: Data Protection Commissioner

Canal House

Station Road

Portarlinton, Co. Laois. R32 AP23.

