

COUNTY OF VENTURA		POLICY AND PROCEDURE MANUAL		VENTURA COUNTY LIBRARY
Originating Agency:	Library Services (VCLS)	Last Issued	Revised	Records Retention and Privacy Policy
Policy of:	VCLS - Branches	8/1/23	1/5/2024	
Procedure:	N/A	N/A	N/A	
Forms (if any):		N/A	N/A	
Policy Change Requires:		<input checked="" type="checkbox"/> Director consultation with Deputy Director <input type="checkbox"/> Review with Fiscal Manager		
Procedure/Forms Change Requires:		<input type="checkbox"/>		

# POLICY AND PROCEDURE

## Your Right to Privacy

Ventura County Library Services (the “Library”) is committed to protecting your privacy by keeping personally identifiable information confidential. Our commitment to your privacy has deep roots in the law and in the ethics and practices of librarianship. The Library holds true to the values of the American Library Association affirming that, “Privacy is essential to the exercise of free speech, free thought, and free association.” As such, we “protect each library user's right to privacy and confidentiality with respect to information sought or received and resources consulted, borrowed, acquired, or transmitted.”

Government Code sections 7927.105 and 7927.100, subdivision (j), protect your library records from disclosure if a member of the public or the media requests them. Library records include any written or electronic record used to identify a customer. This includes, but is not limited to, your borrowing history, name, address, telephone number, or email address. Although the Library does everything we can in order to protect your privacy, there are times when we may be required by law to provide this information. Library records may be subject to disclosure to law enforcement officials under provisions of state and federal law.

Please ask a staff member if you have questions about this policy and/or your rights to privacy in the Library. We're here to help.

## What information do we collect?

The Library strives to collect the least amount of personally identifiable information we can. We avoid creating unnecessary records. We keep your information as long as required by the County of Ventura Records Retention Schedule. We do not engage in practices that might place your information on public view without consent.

You may choose to submit your personal information in order to use some Library services. The personal information you give to the Library is kept confidential. We will not sell, license, or disclose it to any third-party except those working under contract or as required by state and federal law.

We may collect the following personal information from you to access Library services:

- Address
- Telephone Number
- Email address
- Date of Birth
- Library barcode number
- Items currently checked-out, requested, canceled holds, and interlibrary loans
- Overdue items (until returned)
- Fine history
- Sign-up information for library classes and events

The Library does not keep a record of your reading history beyond operational requirements. Once you return an item, it is removed from your account. You may choose to turn on the reading history feature in your online account to keep a log of items you check out. Items with late fees will remain on your account until paid. Third-party vendors may keep a record of your borrowing history.

We use Google Analytics to collect data about the use of our website. We use this information to make improvements on our website and to track trends. Your personal information (name, address, etc.) is not tracked. Whenever possible, we will not track customers who have enabled the “Do Not Track” option in their browsers. Our website collects the following data:

- Browser type
- Anonymized internet address
- Operating system type
- Web address of the page from which you linked to our site
- Device
- Network service provider
- Interaction data

Any personal information given in email messages, chat sessions, web forms, in-person or telephone reference, or other communications is only used for the purpose for which you submitted it.

Radio Frequency Identification (RFID) technology is used to check out library materials, keep a record of the library collection, and secure the collection from theft. RFID tags attached to items only contain the barcode number of the item. No personal library customer or transaction information is on the RFID tag.

## Who has access to my information?

All Library customer records are confidential. Library customer records may only be disclosed to:

- Library staff performing job duties
- Cardholders upon proof of identity
- Parents or guardians of minor children (limited access)
- Anyone with written consent of the cardholder (limited access, per Library policy)
- Under court order

If the Library cardholder is under the age of 18, the parent or guardian listed in the Library record may only be given limited information about that child's record. Proof of the parent or guardian's identity is

required through photo identification. Library staff will only provide information regarding the number of books checked out, due dates, and fines owed.

You can gain access to another Library customer's record through written consent of the cardholder. Per Library policy, the information that will be given is limited to: the number of items checked out, due dates, and fines owed. No additional information will be given.

All Library customers can view and update their personal information. This can be done online or in person. Proof of your identity through photo identification is required to update information in person. A PIN is required to change this information online.

## **How do we protect children's privacy?**

The privacy and safety of children is very important to us. Personal information collected by the Library is not shared with any non-contracted agency or vendor. Due to the ease with which children can share personal information on the internet, we encourage parents and caregivers to monitor online activities.

## **Our Website and Public Computers**

### **HTTPS**

The Library's website ([vencolibrary.org](http://vencolibrary.org)) is encrypted with HTTPS. All communications between your browser and the Library website are private.

### **Cookies**

A cookie is a small file sent to the browser by a website each time that site is visited. Cookies are stored on your computer and can transmit personal information. Cookies are used to remember information about preferences on the pages you visit.

You can refuse to accept cookies, disable cookies, and remove cookies from your hard drive. However, this may result in a lack of access to some library services. Our Library servers use cookies to verify that a person is an authorized user. This allows you access to licensed third-party vendors and to customize webpages to your preferences. Cookies obey the privacy settings that you have chosen in your browser. We will not share cookie information with external third parties.

## **Data & Network Security**

The Library uses software programs that monitor network traffic to identify unauthorized attempts to upload or change information or otherwise cause damage. No other attempts are made to identify individual customers or their usage habits.

## **Public Computers & Connected Devices**

The Library does not keep a record of your activities on any public computer or laptop. Any record of browsing history and activities are removed when you log out. The next customer cannot see any of your information.

All personally identifiable information is purged immediately upon the end of your public computer reservation. An anonymous log is created that includes only the computer terminal number, reservation time, and duration of the session. These anonymous reservation statistics remain in the system for two months.

All connected devices you borrow from the Library (e.g. Chromebooks) have their history manually cleared by Library staff immediately after you log out of the device.

## Email & RSS Feeds

You may choose to subscribe to a variety of mailing lists and/or RSS feeds from the Library. The mailing lists are serviced by Constant Contact. RSS feeds are serviced by Google's FeedBurner. See below for information about how the Library works with this and other third-party vendors.

Using third-party vendors

The Library enters into agreements with third parties to provide online services, digital collections, streaming media content, chat/phone support, collections, and more. When using some of these services, you may also connect with social networks and other users.

Third-party vendors may collect and share your information, including:

- Personally identifiable information you knowingly provide. This includes: when assisting you with your library account, or when you register for the site, provide feedback and suggestions, request information, or create shared content.
- Other information that could be used to identify you. This includes: your Internet Address (IP Address), search history, location-based data, and device information.
- Non-personally identifiable information. This includes: your ad views, analytics, browser information (type and language), cookie data, date/time of your request, demographic data, hardware/software type, interaction data, serving domains, page views, and the web page you visited immediately prior to visiting the site.
- Other data as described in the vendor's privacy policy and terms of use.

For more information on these services and the types of data that is collected and shared, refer to the third-party vendor's Terms of Use and Privacy Policies webpage. You may choose not to use these third-party vendors if you do not accept their terms of use and privacy policies. Please read them carefully.

We make reasonable efforts to ensure that the Library's contracts, licenses, and offsite computer service arrangements reflect our policies and legal obligations concerning customer privacy and confidentiality. Our contracts address restrictions on the use, aggregation, sharing, and sale of information, particularly about minors.

The Library expects third-party vendors to:

- Follow all privacy related items in the vendor contract and licensing agreements.
- Conform to Library privacy policies.
- Provide a product which complies with the Children's Online Privacy Protection Act.
- Refrain from collecting or sharing additional information about customers, other than as needed for delivery of the Library services provided.
- Have a publicly posted privacy policy.

Library customers must understand when using remote or third-party vendor sites that there are limits to the privacy protection the Library can provide.

The Library also suggests links to external websites that are not under contract. You are not required to give these sites your Library card information or any other personally identifiable information in order to use their services.

## Library Photos

Refer to the Library's [Photo Release Policy](#).

## What surveillance is used at the Library?

The Library uses video surveillance, inside and outside of some of our locations. Refer to our [Digital Video Surveillance Policy](#).

## Branch Library Video Surveillance

Several Library branches have security cameras outside and/or inside. The Library adheres to provisions of Government Code section 26206.7 and keeps Library branch security video for 90-days rather than the one-year retention period for routine video monitoring under Government Code section 26206.6 within the following guidelines: (1) the Library retains all specific video recordings that may be subject to a litigation hold; (2) the Library prepares written minutes to duplicate the information that would be otherwise contained on routine Library branch security video showing no incidents; and (3) the Library adopted a retention schedule of 90-days for routine Library branch security video showing no incidents. The Library's [Digital Video Surveillance Policy](#) provides more information about Library branch video surveillance.

## How do we handle law enforcement requests?

Only the Library Director and/or his or her designee is authorized to receive or comply with requests from law enforcement officers. We speak with our legal counsel whenever possible before determining the proper response. Library records are not made available to any agency of state, federal, or local government without the appropriate warrant, court order, or other legal document, such as written consent of the Library customer, authorizing disclosure. These documents must show good cause and be in proper form. We have trained all Library staff and volunteers to refer any law enforcement requests to Library administrators.

## Our commitment to you

Our Library does not share your personally identifiable information with third parties unless required by law. Regular privacy audits are run in order to ensure that all Library programs and services comply with this privacy policy. Library customers who have questions, concerns, or complaints regarding the Library's handling of their privacy and confidentiality rights should contact the Library Director.

The Library reserves the right to change or modify this privacy policy at any time. Changes will be posted on the Library's website.

## Vendor Privacy Policies

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The Library licenses services and content from third-party vendors who have their own privacy policies and confidentiality practices. When you leave the Library website, your interaction with these systems will be governed by their individual privacy policies. Check the privacy statements for specific vendors listed here to learn how your data is stored and used by them.

### eBooks & eMedia

- [Amazon.com](#) (eBooks in Kindle format)
- [Bibliotheca/3M](#)
- [cloudLibrary](#) by Bibliotheca
- [Gale](#)
- [Hoopla](#)
- [Missions of California](#)
- [The Palace Project](#)

### eLearning & eResearch

- [ABCmouse](#)
- [AtoZDatabases](#)
- [Beanstack](#)
- [Brainfuse](#)
- [Coursera](#)
- [Digital Public Library of America](#)
- [California Digital Newspaper Collection](#)
- [California Tax Forms](#)
- [EBSCO](#)
- [Encyclopedia Britannica](#)
- [FamilySearch](#)
- [Federal Tax Forms](#)
- [Gale](#)
- [GetSetUp](#)
- [Kelly Blue Book](#)
- [Learning Express Library](#)

- [Lessonface](#)
- [LinkedIn Learning](#)
- [MedlinePlus](#)
- [Niche Academy](#)
- [New York Times Online](#)
- [NewsBank](#)
- [Occupational Outlook Handbook](#)
- [Open Library](#)
- [PressReader](#)
- [Project Gutenberg](#)
- [Proquest-Clarivate](#)
- [Scholastic](#)
- [TeachinBooks](#)
- [World Digital Library](#)

## On Our Website

- [BiblioCommons \(library catalog\)](#)
- [Eventbrite \(events registration\)](#)
- [Google Analytics - opt-out](#)
- [Gmail](#)
- [Gtranslate](#)
- [Hot Jar - opt-out](#)
- [ILLiad \(OCLC interlibrary loan\)](#)
- [Proquest \(Syndetics\)](#)

## Other

- [SirsiDynix \(Integrated Library System/Online catalog\)](#)
- [Bibliotheca self-checkout machines/Open +/People counters](#)
- [Career Online High School software](#)
- [Savannah OrangeBoy \(email marketing\)](#)
- [Constant Contact \(email newsletter\) - California-specific](#)
- [Total Business Solutions, Inc. \(printing and computer reservations\)](#)
- Unique Management Systems (Collection recovery, Chat/Phone Support)
- [Iron Mountain \(Shredding\)](#)
- [T-Mobile \(VCL computer kit hotspots\)](#)
- [AT&T \(AAA computer kit hotspots\)](#)
- [Tech Logic \(CIRC IT server and workstations\)](#)
- [Laptops Anytime \(laptop kiosks\)](#)
- [Bay Alarm \(video security\)](#)
- [Motorola Solutions \(video security EP Foster Library\)](#)
- [Cisco Meraki \(Wi-Fi filtering, Wireless access points, switches\)](#)
- [Zoom meetings \(Fillmore Library meeting rooms\)](#)
- [Microsoft Teams \(Fillmore Library meeting rooms\)](#)
- [Canon \(Public printing\)](#)

- [Cybrarian \(PC reservations/Print management\)](#)
- [OCLC \(CapiraMobile library app\)](#)
- [Network Solutions \(library website domain\)](#)
- [TeamViewer \(remote access public PCs\)](#)
- [CENIC \(library broadband connection\)](#)