

Bedford Borough Libraries Privacy Notice

Introduction

This Privacy Notice explains in detail the types of personal data we may collect about you when you use our services. It also explains how we will store and handle your data and keep it safe.

The following information should answer any questions you have but if not, please do get in touch with us.

This privacy notice will be updated over time, so please revisit if you have additional questions.

Who are Bedford Borough Libraries?

Bedford Borough Libraries are part of Bedford Borough Council, our services are delivered through 5 branch libraries, a mobile library, housebound service and online:

- Bedford Central Library
- Bedford Mobile Library
- Bromham Library
- Kempston Library
- Library Link Service
- Putnoe Library
- Wootton Library
- Virtual Library

For simplicity throughout this notice, 'we' and 'us' means Bedford Borough Libraries.

Bedford Borough Libraries (Bedford Borough Council) will be the Data Controller.

What legal basis do we rely on?

Data protection law provides a number of reasons by which we can collect and process your personal data. Bedford Borough Libraries collect your data on the basis of the five listed below:

Public interest

This refers to where the collection of your personal data is required to perform a public task, in other words so you can use our services.

We will only collect data that is specifically required to perform our public task of delivering a library service as defined in the Public Libraries and Museums Act 1964.

An example of this would be when you join the library service we will collect your name, address, age and other contact details.

Consent

In specific situations, we can collect and process your data with your consent.

An example of this would be when you agree to provide your data for the Local Information Database.

Legal compliance

If the law requires us to, we may need to collect and process your data.

An example of this would be we can pass on details of people involved in fraud or other criminal activity affecting the library service and its customers to law enforcement.

Vital interest

In certain circumstances we may require more sensitive personal data to ensure your health and well-being whilst using our services.

For example, if your child is attending a regular club in the library we would need to know if they had any life-threatening allergies so we are aware of the appropriate actions to take if an incident occurs.

Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations.

An example of this would be if you apply for a job or volunteering opportunity within the library service.

When do we collect your personal data?

- When you join the library
- When you use our library services to borrow, renew items, request titles, and pay charges either in the library, online, through the app or on the phone.
- When you engage with us on social media
- When you contact us with queries, complaints etc
- When you ask our staff to contact you about your account or our services
- When you review titles online using Arena, the library catalogue
- When you fill in any forms. For example, if an accident happens in the library, a member of staff will collect your personal data
- When you use our libraries which have CCTV systems operating for the security of both customers and staff. These systems may record your image during your visit
- When you apply for a job or volunteer in the library service.

This list is not intended to be exhaustive and may be updated from time to time.

How do we collect your personal data and what sort of data do we collect?

Bedford Borough Libraries collects personal data that on its own or combined with other data allows us to identify you as an individual. We collect this data directly from you or from your use of our services. Where possible we try to use this data without identifying individuals.

We will not collect sensitive personal data unless it is essential to do so.

Your data is stored in both paper and electronic format.

- When you join the library we collect your:
 - Title
 - Name
 - Address
 - Telephone numbers

- Email address
- Gender
- Date of birth

The data is used to create an account and provide you with a unique library card number and a PIN.

We record and retain for two years your transactions in the library; loans, renewals, returns, requests, payments and your PIN

- If you contact the library using the Virtual Library, e-mail and/or customer feedback forms, we will collect and retain for 3 years your:
 - Name
 - Address
 - Telephone numbers
 - Email address
 - Enquiry
 - Our response
- The details of your visits to our websites and app are recorded to enable us to monitor use of our services, so we can report on usage and also identify areas for development
- Your use of the library public computers is recorded; we record the computer you use, plus the time and the date it was used
- Library Link, the housebound service, collects details of your favourite authors and genres so that we can select and deliver stock to suit your reading tastes. This information is held until you stop using the service
- Your image may be recorded on CCTV when you visit the library and is held for 28 days
- Your social media username, if you interact with us through those channels, is recorded to help us respond to your comments, questions or feedback. However, be aware that these social media platforms do have their own privacy notices
- We do not collect or hold any payment card information

For more detailed information about what information we hold and for how long please read the individual Service Privacy Notices and our Retention Policy.

Sensitive Personal Data

Bedford Borough Libraries may on rare occasions require sensitive personal data to ensure your health and well-being when using some of our services. For example, details of illness, health issues, access requirements. We will only collect this information with your consent and it will only be retained for the length of time that you are using that specific service.

Why do we use your personal data?

Bedford Borough Libraries will use your personal data to deliver the services you are using. For example to;

- Provide you with and enable you to use our services both online and physical
- Investigate, respond to and act on your comments, complaints, queries and suggestions.
- Ensure that our services are provided in the most effective and appropriate way for you and the device you are using
- Manage and improve our services
- Send you details of major changes or improvements and consult with you about the service

- Ensure our records are accurate and up to date
- Comply with our legal obligations and to perform our statutory and public functions and duties
- Manage our legitimate internal analyses; audit, forecasts and business planning
- Enforce our rules and policies for example the Library Byelaws and Regulations
- Help ensure your safety and the security of our libraries, their stock and facilities
- Establish, defend or exercise our legal rights
- Comply with orders/requests received from public and regulatory, governmental and judicial bodies, such as the police.

This list is not exhaustive and may be updated from time to time.

If you wish to change how we use your data, you'll find details in the 'What are my rights?' section. However, if you choose not to share your personal data we may not be able to provide services to you.

What do we do to protect children's personal data?

We consider all members under 16 years old to be children, their membership is updated to teen when they are aged between 16 and 18, then at 19 they become adult members.

Children's personal data is protected in the same way as adult's data; however we also have additional measures in place to ensure that only the guarantor has access to a child's data. The guarantor is the adult that signs the membership form when a child joins the library.

When a child joins as an instant member we send a letter to the child's parent/guardian at the address provided informing them that they are the child's guarantor, they can then choose to delete the membership or upgrade to full membership.

Information Society Services; we do not believe that any of the services we provide meet the GDPR definition of an Information Society Service.

How do we protect your personal data?

We know how much data security matters to you. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.

- We will ensure that all paper files that contain personal data are stored securely
- We will secure access to all transactional areas of our websites and app using 'https' technology
- Access to your personal data online will be PIN-protected
- We will regularly monitor our system for possible vulnerabilities and attacks
- We will retain your personal data for a limited time, and where feasible the data will be anonymised. To learn more about this please read the Library Service Retention Policy

Please be aware we cannot guarantee the security of information sent over the internet, except using library or council forms. For example, information sent by e-mail is unlikely to be secure.

How long will we keep your personal data for?

We will only keep your personal data for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised so that it can be used in a non-identifiable way for statistical analysis and business planning.

Some examples of customer data retention periods are below:

Inactive library cards

If you've not used your library card for more than five years your details will be deleted from the system. If you have outstanding loans your details will be deleted seven years after the loan items default. If you have outstanding sums in your account your details will be deleted after seven years of inactivity.

Customer comments, compliments and queries

All customer feedback, received through the Virtual Library, e-mail and customer feedback forms, will be retained for three years from the date received.

[Click here to see the Library Service Data Retention Policy.](#)

Who do we share your personal data with?

Your personal data will be available to members of library staff who need it to perform their library tasks and deliver a service to you.

We will also share your personal data with expert trusted third parties who enable us to deliver services to you. Here's the policy we apply to those organisations to keep your data safe and protect your privacy:

- We will provide only the information they need to perform their specific services
- They may only use your data for the exact purposes we specify
- We will work closely with them to ensure that your data is stored securely and your privacy is respected and protected at all times
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous

Examples of the kind of third parties we work with are:

- Library Management System supplier
- Computer management software suppliers
- Security company
- Other council departments

We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.

Where your personal data may be processed

The majority of your personal data will be stored within the European Economic Area (EEA). The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway.

For some services we may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA such as Australia or the USA. If we do this, we have

procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA.

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

What are your rights?

You have a number of rights over your personal data we hold. You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases
- The correction of your personal data when incorrect, out of date or incomplete
- All your data be removed from our systems
- That we restrict or stop using your personal data

To protect your information, we will ask you to prove your identity before proceeding with any request you make. If you have asked a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

If we choose not to carry out your request we will explain to you the reasons for our refusal.

You have the right to appeal our decision by contacting the Information Commissioner's Office (www.ico.gov.uk).

Your right to access your personal data

You can ask us to provide you with all the personal and supplementary data we hold within the Library Service. Please submit a Subject Access Request using the Bedford Borough Council's Subject Access Request form, available online at:

http://www.bedford.gov.uk/council_and_democracy/data_protection,_foi_eir/data_protection.aspx

You can specify the format of the data we supply, either paper or electronically. We will supply this information within a month, unless we provide reasons for not being able to do so, in which case we can extend the delivery date by up to two months.

Your right to correct or complete data

If you believe the data we hold is incorrect or incomplete then you can request your records are updated. Please submit a Data Rectification Request using the Bedford Borough Council's form, available online at:

http://www.bedford.gov.uk/council_and_democracy/data_protection,_foi_eir/data_protection.aspx

We will then provide you with evidence that your data has been rectified, in a format of your choosing, either paper or electronically. We will supply this information within a month, unless we provide reasons for not being able to do so, in which case we can extend the delivery date by up to two months.

We will also contact third party services to ask them to update their records in the same way.

Your right to be forgotten

You can ask us to remove all your personal data from our systems, and those of third party services. Please submit a Right to be Forgotten Request using the Bedford Borough Council's form, available online at:

http://www.bedford.gov.uk/council_and_democracy/data_protection,_foi_eir/data_protection.aspx

We will comply with this request within a month, unless we provide reasons for not being able to do so, in which case we can extend the delivery date by up to two months.

N.B: Please note that if you have outstanding loans or accounts we will not be able to remove your details until you return the items and/or pay the charges.

Your right to be restrict processing

You can request that we stop processing or 'block' the processing of your personal data. When this happens, we retain the right to store but cannot use your personal data. Please be aware that in this instance we may not be able to provide you with our services.

Please submit a Right to Restrict Processing Request using the Bedford Borough Council's form, available online at:

http://www.bedford.gov.uk/council_and_democracy/data_protection,_foi_eir/data_protection.aspx

We will comply with this request within a month, unless we provide reasons for not being able to do so, in which case we can extend the delivery date by up to two months.

Your right to portability

You can ask us to provide all your personal data in a structured and machine readable format so it can be transferred to another service.

Please submit a Right to Portability Request using the Bedford Borough Council's form, available online at:

http://www.bedford.gov.uk/council_and_democracy/data_protection,_foi_eir/data_protection.aspx

We will comply with this request within a month, unless we provide reasons for not being able to do so, in which case we can extend the delivery date by up to two months.

Your right to object

You have the right to object to our processing of your data on basis of public interest. Please be aware that in this instance we may not be able to provide you with our services.

Please submit a Right to Object Request using the Bedford Borough Council's form, available online at:

http://www.bedford.gov.uk/council_and_democracy/data_protection,_foi_eir/data_protection.aspx

We will comply with this request within a month, unless we provide reasons for not being able to do so, in which case we can extend the delivery date by up to two months.

What happens if there is a data breach?

The Library Service will record any and all data breaches. Those that meet the requirements set by the Information Commissioner's Office (ICO) will be reported to the ICO within 72 hours of the data breach and all affected individuals will be informed. Find out more at <https://ico.org.uk/for-organisations/report-a-breach/>

Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113.

Or go online to www.ico.org.uk/concerns

Any questions?

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact:

Information Governance

Bedford Borough Council

Borough Hall Cauldwell Street Bedford MK42 9AP

Email: dpo@bedford.gov.uk

Telephone: 01234 267422