



# **Wexford County Council Public Library Service**

**Data Protection Act 2018**

# **Privacy Statement**

Revised Version September 2020

## **Who we are and why do we require your information?**

Wexford County Council seeks to lead the economic, social, cultural and environmental development of the county and to provide high quality services at local level. Our vision is for an inclusive county of sustainable urban and rural communities that have respect for their environment, a sense of local identity comprising shared purpose and a deep sense of civic pride.

The promotion of a culture of excellence in service delivery remains one of Wexford County Council's core objectives and is included in our Corporate Plan. This quality service includes not only the level and quality of service given to our customers, but also the quality of our decision-making processes, the efficiency and effectiveness of our corporate operations, standard of our facilities and our ability to adapt in an ever-changing environment.

In order to provide the most effective and targeted range of services to meet the needs of the citizens, communities and businesses of County Wexford we will be required to collect, process and use certain types of information about people and organisations. Depending on the service being sought or provided, the information sought may include 'personal data' as defined by the Data Protection Acts and by the general data protection Regulation (GDPR) and may relate to current, past and future service users; past, current and prospective employees; suppliers; and members of the public who may engage in communications with our staff.

In addition, staff may be required, from time to time, to collect process and use certain types of personal data to comply with regulatory or legislative requirements.

## **Why do we have this privacy statement?**

The Council has created this privacy notice to demonstrate our firm commitment to privacy and to assure you, that in all your dealings with the Library Service, the Council will ensure the security of the data. The personal data you may be required to supply to the Council, or may be collected through other sources (i.e. investigations by Council staff; CCTV, information from other third parties or agents acting on your behalf) 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 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.

More detail is available in our Data Protection Policy statement at

[Data Protection Policy on our website www.wexfordcoco.ie](http://www.wexfordcoco.ie)

### **Information Collected by the Council**

The Council processes and uses certain types of information about individuals (Data Subjects) and organisations to provide the most effective and targeted range of services to meet the needs of the citizens, communities and businesses of County Wexford. This includes contact details to allow for efficient communication. You do not have to provide all contact details but providing more, such as email, phone, address, makes it easier to communicate with you.

### **What is the basis for making the processing of this personal data lawful?**

Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in Wexford County Council in accordance with Article 6 (1)(e) of the General Data Protection Regulation, 2016. Specifically the lawful basis for this process is the Local Government Act 2001, Section 78.

### **How we use your Personal Information**

The information we collect and hold on you will be used:

- to enable the provision of an effective Library Service
- to fulfil membership requests
- to fulfil bookings for attendance at events
- to inform you of services available from our library service and its affiliates
- to process payments, e.g. fees for services provided to the library, payment of invoices, etc.
- to contact you to conduct research about your opinion of current services or of potential new services that may be offered

### **Covid-19 and HSE contact tracing- Personal data collected and processed to provide library services during Covid-19 pandemic**

Wexford County Council Library Service is obliged to keep a log of contact/group work to facilitate contact tracing. Should there be a COVID-19 positive case, public health officials may request the log as part of the contact tracing process. The information provided for booking of the study space may be used for the purposes of

contact tracing should it be required by HSE. As access to the study space is linked to library membership personal data, which is collected for library membership such as details of applicant, e.g. first name and last name, postal address, email address and mobile number may also be provided to the HSE for this purpose.

Contact tracing logs will be held securely for 30 days, after which time they will be destroyed.

All users must supply contact details to avail of study space facilities, including under-16s. When personal information of under-16s is to be collected, Article 8 (1) of the EU GDPR requires that consent is given or authorised by the holder of parental responsibility over the child.<sup>1</sup>

Staff will record:

user name

user membership number

date and time of study space booking

## **Library Membership**

All applications for Library Membership are required to provide information on the following categories of data; Personal details of applicant (e.g. first name and last name, address including eircode, year of birth, gender, email address, mobile number, home library, library card number, pin)

Membership expires annually and can be renewed at the request of the library patron.

Any personal information provided will be treated with the highest standards of security and confidentiality, in accordance with the Data Protection Acts, 1988, 2003 and 2018.

Data is shared with other Irish Local Authority Libraries for the purpose of providing shared library services and a Single Library Management System and other library related business. In addition, data is also shared with trusted third parties who provide support to us and to the Single Library Management System (LMS) and will process data on our behalf in accordance with appropriate data sharing confidentiality agreements.

## **What is the Library Management System (LMS)?**

The Library services use a computer software platform called the Library Management System (LMS).

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<sup>1</sup> <https://gdpr-info.eu/art-8-gdpr/>

The 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. For further information about Innovative Interfaces Global Ltd then please [click here](#)

### **Notification of Library Events**

We will only contact you if you have given your explicit consent to receive notifications in connection with your use of the service and notify you about library events. You have a right to withdraw your consent at any time by emailing your local library branch. You can unsubscribe from our eNewsletter at any time, by clicking on the unsubscribe link at the foot of the email, this link appears on every eNewsletter we send out.

### **Disclosure of information to third parties**

We share your personal information with local authority public library services. The sharing of your personal information is primarily within the local authority public library service in the area that you live. One of the advantages of a national library service is that you may research and reserve a library item from a different local authority public library service.

The Local Government Management Association LGMA (Libraries Development) has arranged for library members to access six online resources provided by third parties as follows:

<b>No</b>	<b>Online Resource</b>	<b>Third Party per contract (click for link to privacy statement)</b>
1	Newspapers	<a href="#">Press Reader International Ltd</a>
2	Magazines	<a href="#">WF Howes Ltd (EEA agent for Recorded Books Inc (aka rbdigital.com))</a>
3	eBooks	<a href="#">Bolinda UK Limited</a>
4	eAudio Books	<a href="#">Bolinda UK Limited</a>
5	Language Learning	<a href="#">WF Howes Ltd (EEA agent for Recorded Books Inc (aka rbdigital, Transparent Language Online))</a>
6	Learning	<a href="#">WF Howes LTD (EEA agent for Universal Class llc)</a>

Wexford County Council Public Library Service has arranged for library members to access six online resources provided by third parties as follows:

No	Online Resource	Third Party per contract (click for link to privacy statement)
1	eMusic Freegal Music	<a href="#">Library Ideas LLC (Freegal)</a>
2	Digital Comics & Graphic Novels	<a href="#">rbDigital Comics &amp; Graphic Novels</a>
3	Britannica Online	<a href="#">Encyclopaedia Britannica</a>
4	Vision Net	<a href="#">CRIF VisionNet Limited</a>
5	Mintel Market Research	<a href="#">MINTEL Academic</a>
6	B2B database - Business.ie	<a href="#">Data Ireland B2B Business</a>

These third parties are data controllers in their own right. They will collect personal data about you including your library card for their own purposes. Neither LGMA (Libraries Development) nor Wexford County Council share your personal data with these third parties. LGMA (Libraries Development) and Wexford County Council do allow them to check certain information items against the Library Management System in order to confirm their validity. You should refer to the privacy statements of each of the listed third parties for their privacy information about what they do with their data and what rights are available to you. LGMA (Libraries Development) and Wexford County Council produce aggregate reports on the usage of these systems.

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

### **Personal data collected and processed in our use of CCTV**

This privacy notice is designed to complement the council's [CCTV policy](#) and must be read in conjunction with that policy.

Wexford Library Service has CCTV systems in operation at all times in all library buildings for the purposes of:

- the prevention and deterrence of crime, disorder and anti-social behaviour
- the detection of crime, disorder and anti-social behaviour

- to ensure the security and safety of Wexford libraries, council and contractor employees, and visitors to Wexford libraries
- to ensure the safe and secure operation of the My Open Library service

Processing of this data is necessary to protect the vital interests of the data subject or another person; for compliance with legal obligations; and for the performance of tasks carried out in the public interest or for our official functions.

CCTV captures visual images of persons in or around our buildings and facilities. This personal data is collected through the CCTV cameras operated by the Library and not from a publicly available source. In certain circumstances we may be required to disclose CCTV images to certain bodies of authority, such as An Garda Síochána and Emergency Services.

We process CCTV footage for 28 days after the date of capture, although we may process footage for a longer period, for example if the footage is relevant to an investigation. Your core rights as a data subject apply to this processing.

### **Website Visitors**

Like most websites, the Council collects non-personally-identifying information of the sort that web browsers and servers make available, such as the browser type, language preference, referring site, and the date and time of each visitor request. We do this to maintain the quality of the service, to determine what library services are the most popular and to provide general statistics regarding use of the Council website.

### **Cookies**

The Council website uses “cookie” technology. Cookies are small data files placed on your computer, mobile or other device when you browse online.

Generally speaking, cookies do not contain personal information from which you can be identified, unless you have furnished such information to the website.

Most browsers allow you to turn off cookies or to customise your settings for cookies. To find out how to do this, see the 'Help' menu on your browser. Please note that if you turn off cookies or change your settings, some features of this web site may not work correctly.

### **Use of Cookies and Google Analytics**

The Council website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site.

The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States.

Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf.

Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of the Council website.

### **How long is my data kept for?**

The Local Authority sector operates under a detailed record retention policy which outlines time periods for which your data will be retained and what will happen to it after the required retention period has expired.

The [National Retention Policy for Local Authority Records](#) provides information on the criteria for determining retention, archival and deletion or end dates for Council records in all the functions it operates. Links to the Policy will be provided in our Privacy Statement and updated as the Policy is renewed.

### **Do you need to update my records?**

Wexford County Council must take reasonable steps to ensure that personal data we have about our customers is correct and up to date. In addition, if the data held by us is found to be inaccurate you have the right to rectify / correct this.

If you find that personal data that we have about you is inaccurate or needs to be updated (for instance, you may have changed your name, address, contact details etc.) then please contact us so that we can correct it. You can do this by

**Emailing us at:** [libraryhq@wexfordcoco.ie](mailto:libraryhq@wexfordcoco.ie)

**Writing to us at:** Wexford Library Management Services, Block D, Floor 2, Wexford County Council, Carricklawn Wexford. Y35 WY93

### **Security**

Wexford County Council Public Library Service takes its security responsibilities seriously, employing appropriate physical and technical measures including the use of a Staff Access Control system with audit controls and staff training and awareness. We have internal procedures and computer interfaced protective barriers to keep your information as safe and secure as we possibly can.



We cannot, however, guarantee the privacy or confidentiality of any information, whether or not relating to you as the user, passing over the Internet via non secured emails.

### **Your data protection 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 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 Wexford 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. For further details on exercising your rights see:

[How to Make a Data Access Request](#)

### **Right of Complaint to the Office of the Data Protection Commissioner**

If you are not satisfied with the outcome of the response you received from Wexford 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](http://www.dataprotection.ie) or you can contact their Office at:

Lo Call Number: 1890 252 231

E-mail: [info@dataprotection.ie](mailto:info@dataprotection.ie)

Postal Address:

Data Protection Commissioner  
Canal House  
Station Road  
Portarlinton, Co. Laois. R32 AP23.

### **Changes to our Privacy Policy**

This policy is a living document that will be reviewed, edited and updated on a regular basis.

### **What to do if you have further questions**

If you would like any additional information regarding our procedures and commitment in becoming GDPR compliant or any further information, please contact [libraryhq@wexfordcoco.ie](mailto:libraryhq@wexfordcoco.ie)