

## **Privacy notice –Public Library Services**

### **Who will process your information?**

The personal information you give to us through any of our forms relating to use of public libraries and any other personal information we hold about you in this context will be processed by East Renfrewshire Culture and Leisure Ltd, St. John's, 18 Commercial Road, Barrhead, East Renfrewshire, G78 1AJ for the administration of the library service and associated activities.

East Renfrewshire Culture and Leisure is a charitable trust set up by East Renfrewshire Council in 2015 to manage and deliver its culture and leisure services.

### **Why do we process your information?**

Your information is processed to help us operate the public library service through the effective management of loans, reservations, public internet access, learning opportunities, local history and heritage services, and events and activities and access to Clarkston library through the Open + system. We will automatically send you operational messages such as notification of overdue or reservations by email if you provide your email address. It is also used to ensure you get any concessions that you are entitled to, and where you have opted in to receive marketing and promotional information we will contact you for this purpose. We will use your information to help us improve the service by asking for your feedback following certain events and activities, and to record your attendance via a register. If you participate in any learning activities run by the library service we will use your information to record your progress and which courses you have completed.

Your information may also be shared with other services within the Trust and other organisations for the same purposes and also to

- check the information we have is accurate;
- prevent and/or detect crime;

Other organisations may include other councils, public sector agencies, government departments, regulatory and law enforcement bodies and other private companies or entities (such as contractors providing IT systems on which library services information is held)

### **What is the legal basis for us to process your information?**

East Renfrewshire Culture and Leisure processes your information in order to perform a task carried out in the public interest and in the exercise of official authority, namely the task of offering public library services, in terms of the Local Government (Scotland) Act 1973.

The law gives certain types of information special significance because of its sensitivity e.g. health information. If we process this type of information about you in relation to public library services we do so on the basis that it is necessary for reasons of substantial public interest.

## **Do you have to provide your information?**

Without the correct information we may be unable to record and process your library loans, charge you the correct rate for late fines and other library charges, and offer you access to other library service events and activities including public internet access and WiFi.

## **How do we collect information about you?**

We obtain personal information about people

- directly from you, for example when you fill out an application form
- from other people who are connected with you in connection with a service to be or being provided to them
- from people who are complaining regarding your actions and compliance with the law and
- other public bodies such as other Councils, Police Scotland, Audit Scotland and regulators such as the Scottish Social Services Council or the General Teaching Council.

Such information includes:-

your name & contact details (including email and telephone numbers)

your age & date of birth

your membership status (in order to assess relevant exemptions) eg concession

your ethnicity should you choose to complete that part of the form at time of registration

your preferred method of communication, including marketing opt-in.

your book loan history, reservation history, notifications history and library finance history

your PC usage and connection to Public WiFi history

Any messages specific to you in terms of your use of the public library service such as author preferences, blocked borrower reasons, etc.

## **How long will we keep your information?**

We are aware that we must not keep personal information longer than is necessary for our purposes. Sometimes, law sets down these time limits. In that case, we must comply with those specified time limits.

However, in most cases this relates to where we have a business need to keep the personal information although it may not be actively using the information. This usually depends upon whether anyone has continuing interest in (such as auditors) or rights to take action of any sort against us in relation to the reason why we were using the information

The Trust will hold your information on the library management system for a period of 3 years from the expiry date of your library membership record if you do not renew it during this time. Your information on the system will be destroyed under confidential conditions after this period. Your initial paper membership form will be destroyed as soon as the information is used to create your electronic membership record.

Information not stored on the library management system but recorded for other reasons such as feedback, attendance at events, use of local history and heritage services, etc. will be kept for 5 years beyond the date it was first obtained.

### **Who is your information shared with?**

Your information will be accessed by Trust and council staff who need to do so to provide effective library services. This may also include school libraries. If such administration is provided on the Trust's behalf by an external agency, that agency will also have access to your information.

Your information may also be shared with other services within the Trust, other services within East Renfrewshire Council, other councils, public sector agencies, governmental departments and other private companies or entities (such as IT system service providers).

The Trust also generally complies with requests for specific information from other regulatory and law enforcement bodies where this is necessary and appropriate.

### **Do we transfer your information outside the UK?**

In general we do not transfer personal information outside the UK but on the rare occasions we do we will inform you.

We will only transfer information outside the UK when we are satisfied that the party that will handle the data and the country it is being processed in have adequate safeguards for personal privacy comparable to those which are in place in the UK.

### **Profiling and automated decision-making**

The Trust does not use profiling or automated decision-making for administering library services or activities. Some processes are semi-automated but a human decision-maker will always be involved before any decision is reached in relation to you.

### **Your rights**

You have the right to:

1. Be informed of the Trust's use of your information

This notice is intended to give you relevant information to meet this right.

2. Access personal data held about you
3. Request rectification of your personal data
4. Request that the council restricts processing of your personal data
5. Object to the processing of your data
6. Ask us to delete your information
7. Withdraw your consent if consent is the lawful basis for processing your data

## Complaints

If you have an issue with the way the Trust handles your information or wish to exercise any of the above rights in respect of your information you can contact the Trust's data protection officer by post at:

The Data Protection Officer

East Renfrewshire Council

Council headquarters

Eastwood Park

Giffnock

G46 6UG

or by email at [DPO@eastrenfrewshire.gov.uk](mailto:DPO@eastrenfrewshire.gov.uk)

You have the right to complain directly to the Information Commissioner's office (ICO).

The address of their head office is: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5EF

Telephone: 0303 123 1113

Alternatively, you can report a concern via their website at [www.ico.org.uk](http://www.ico.org.uk)

The ICO also have a regional office at 45 Melville Street, Edinburgh EH3 7HI

Telephone: 0303 123 1115      e-mail: [scotland@ico.org.uk](mailto:scotland@ico.org.uk)

While you can go directly to the ICO, the Trust would welcome an opportunity to address any issues you have in the first instance.