



Comhairle Contae
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Roscommon
County Council



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ROSCOMMON COUNTY COUNCIL

Privacy Statement

Library Service

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1.0 Introduction

The role of the Library Service is to manage the its services for the entire County of Roscommon through a network of fixed locations and mobile units. It achieves this through providing the following services/functions:

- Provision of a library service – library member administration
- Provision of a library service – library administration
- Provision of a library service – related online library member services

2.0 Purpose of Privacy Statement

The purpose of this privacy statement is to describe, in clear and concise terms, the personal data the Library Service may collect about individuals, why it is needed, how it is used and how individuals may interact with the Library Service in relation to their personal data. It also outlines the rights of individuals under data protection legislation in relation to the processing of their personal data.

3.0 Definitions

For the purposes of this privacy statement the following definitions apply:

- **Data Subject:** is an individual who is the subject of personal data.
- **Personal Data:** any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

- **Special Categories of Personal Data:** is personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; genetic data; biometric data processed for the purpose of uniquely identifying a natural person; data concerning health and data concerning a natural person's sex life or sexual orientation.

4.0 Scope

This statement applies to all personal data processed by the Library Service in physical or electronic format. This data primarily relates to information needed to facilitate library members to avail of library services.

5.0 Data Protection Policy

The Library Service collects a significant amount of personal data in various formats on an on-going basis. Roscommon County Council is committed to ensuring that personal data processed by its Library Service is:

- Obtained lawfully, fairly and in a transparent manner;
- Obtained for specified, explicit and legitimate purposes only;
- 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 in a manner that ensures the appropriate security of the personal data including protection against unauthorised or unlawful processing.

Roscommon County Council has a Corporate Data Protection Policy which goes in to more detail as to how it intends meeting these commitments. A copy of this document can be accessed [here](#).

6.0 What Personal Data is Processed

Details of personal data processed by each of the services/functions of the Library Service are contained in the following tables:

Table 6.1	
Service/Function	Personal Data Processed
Provision of a library service – library member administration	Library membership registration details as follows: <ul style="list-style-type: none">• Name (first name and last name)• Address including Eircode• Year of birth• Gender• E-mail address• Mobile number• Library card number• PIN

Table 6.2	
Service/Function	Personal Data Processed
Provision of a library service – library administration	Borrowing details as follows: <ul style="list-style-type: none">• Items currently on loan to a library member• Inter library loans to a library member• Items currently on hold for a library member• Items a library member has told the Library Service that he/she has returned• Fines owed by a library member• How a library member would like the Library Service to contact him/her• Notes

Table 6.3	
Service/Function	Personal Data Processed
Provision of a library service – related online library member services as follows: <ul style="list-style-type: none"> • Newspapers • Magazines • eBooks • eAudio Books • Language Learning • Learning 	<ul style="list-style-type: none"> • Name (first name and last name) • E-mail address • Library card number • PIN • Language preference

7.0 Why Personal Data is Processed

Personal data is processed by the Library Service in order to provide access and allow library members avail of the library service.

If the Library Service proposes to process personal data for a purpose other than it was obtained for it will, prior to such processing, provide the data subject with information on that purpose and any other relevant information.

8.0 The Legal Basis for Processing Personal Data

The legal basis for processing personal data by the Library Service is mostly contained in the following legislation:

- Local Government Act, 2001 – Part 9, Chapter 3 – Library and Archival Functions
- The Local Government Management Agency Establishment Order 2012 – Statutory Instrument 290 of 2012
- The Local Government (Miscellaneous Provisions) Act 2012 (Transfer of Functions of An Chomhairle Leabharlanna) Order 2012 – Statutory Instrument 423 of 2012.

There may be a limited number of circumstances whereby the Library Service relies on consent for the processing of personal data. In such circumstances the data subject has the right to withdraw consent to the processing of his or her personal data at any time.

Where special categories of information are being processed the Library Department will obtain the data subject's explicit consent to such processing unless this is not required by law or the personal data is required to protect the health of the data subject in an emergency.

9.0 How Personal Data is Obtained

9.1 Most of the personal data collected by the Library Service is obtained directly from library members.

9.2 The Library Service also creates personal data as a result of processing activities carried out by the services it provides e.g. circulation of books and other items.

10.0 How Personal Data is Processed

The processing of personal data by staff within the Library Service is generally carried out by the Library Management System (LMS). Roscommon County Council and the Local Government Management Agency (Libraries Development) are Data Controllers for all personal data held by the LMS. Innovative Interfaces Global Ltd., who are a global provider of library management systems, act as a Data Processor by providing and hosting the LMS. The Local Government Management Agency (Libraries Development) also uses a small number of third parties as Data Processors to provide information technology and other supports for the LMS.

11.0 Sharing Personal Data with Third Parties

The sharing of personal data with third parties will only occur in circumstances that are permitted by law.

Details of the sharing of personal data by the Library Service with third parties are contained in the following tables:

Table 11.1	
Service/Function	Third Parties with whom Personal Data is Shared
Provision of a library service – library member administration	<ul style="list-style-type: none">• Other local authority public library services (when reserving a library item from a different local authority public library service)

Table 11.2	
Service/Function	Third Parties with whom Personal Data is Shared
Provision of a library service – library administration	<ul style="list-style-type: none">• None

Table 11.3	
Service/Function	Third Parties with whom Personal Data is Shared
Provision of a library service – related online library member services as follows: <ul style="list-style-type: none">• Newspapers• Magazines• eBooks• eAudio Books• Language Learning• Learning	<ul style="list-style-type: none">• None

12.0 Records Retention Policy

The Library Service's practices in relation to the retention of personal data are guided by the Local Government Management Agency's (LGMA) National Retention Policy for Local Authority Records and any updates that are issued by the LGMA. Copies of these documents are available [here](#).

13.0 Data Subject Rights

Data subjects have a range of rights under GDPR. These include the following:

- The right to be informed;
- The right of access;
- Right to rectification of inaccurate or incomplete data;
- The right to erasure (also known as the 'right to be forgotten') of personal data;
- The right to portability;
- The right to object to the processing of personal data;
- The right to restrict the processing of personal data;
- Rights in relation to automated decision making, including profiling.

Roscommon County Council has developed a Data Subject Rights Policy and Procedures document which provides more detailed information on the rights of a data subject and how to exercise them. A copy of this document is available [here](#).

14.0: Complaints to the Data Protection Commission

14.1 Data subjects may make a complaint in the following circumstances:

- a) If they experience a delay outside of the prescribed timeframe for making a decision on a data subject right request;
- b) If they are dissatisfied with a decision by Roscommon County Council on their data subject right request;
- c) If they consider that Roscommon County Council's processing of their personal data is contrary to data protection legislation.

14.2 Contact details for the Data Protection Commission are as follows:

Phone Number: 0761 104 800 or Local 1890 252 231
E-mail: info@dataprotection.ie
Website: www.dataprotection.ie
Postal Address: Data Protection Commission
Canal House
Station Road
Portarlinton
Co. Laois
R32 AP23.

15.0 Monitoring and Review

Provisions contained in this statement shall be subject to on-going monitoring and review.

16.0: Further Information

Further information and advice on the operation of this privacy statement is available from the Data Protection Officer, Roscommon County Council. Contact details for the County Council's Data Protection Officer are as follows:

Phone: 090 6637100
E-mail: dataprotection@roscommoncoco.ie
Website: www.roscommoncoco.ie
Postal Address: Roscommon County Council
Áras an Chontae
Roscommon
F42 VR98.