

3.0 CONFIDENTIALITY AND PRIVACY POLICY

3.1 Personal Information Collection

The Howard Miller Library is committed to protecting patron privacy and uses best practices to ensure that personally identifiable information remains confidential.

To conduct Library business and provide services, the Library may collect the following personal information:

- Name
- Address
- Telephone number
- Email address
- Date of birth
- Driver's license or state ID
- Library barcode number
- Materials currently checked out and/or requested
- Overdue materials (until returned)
- Unpaid account charges (until paid)
- Payment history

The Library complies with all applicable federal and state laws governing the privacy and confidentiality of patron records, including the Michigan Library Privacy Act (MCL Act 455 of 1982). It also adheres to the privacy recommendations of the American Library Association and the Michigan Library Association.

Patron confidentiality applies to, but is not limited to, circulation records, electronic resource usage, interlibrary loan transactions, program attendance, and all services provided. Library staff will access and use patron information only for official business purposes. The Library does not sell, lease, or disclose personally identifiable information to third parties—including vendors, presenters, or government officials—unless required by law.

3.1.1 Legal Protections

Under the Michigan Library Privacy Act, library records may not be disclosed to third parties without the written consent of the patron or a court order issued under due process (MCL 397.603).

A "library record" is defined as any document or stored data that contains personally identifying information about a patron, including their name, address, or telephone number, or that identifies materials requested or borrowed. This definition does not include non-identifying data collected for statistical purposes.

3.1.2 Authority for Policy

This policy is authorized by:

- Michigan Library Privacy Act, 1982 Public Act 455, MCL 397.605
- Public Act 7 of 1998, which amends the Michigan Library Privacy Act

Records protected under this law are exempt from disclosure under the Freedom of Information Act (MCL 397.603 and MCL 15.243[d]).

3.2 Circulation History

The Library does not retain a record of patron reading history beyond what is necessary for current transactions. Once an item is returned, it is removed from the patron's account.

Patrons may choose to activate a reading history feature in their online account. Please note that third-party vendors used by the Library may maintain their own record of borrowing history, subject to their individual privacy policies.

3.3 Website

The Library uses Google products to analyze website traffic and usage patterns. This data helps improve services, monitor trends, and prevent spam. The Library does not track or collect personally identifiable information through its website analytics.

3.4 Library App

The Lakeland Library Cooperative app allows patrons to access services on mobile devices. The app collects basic usage data, such as feature engagement and access frequency. The Library does not collect or store personal information through the app.

3.5 Public Library Computers

The Library does not retain patron browsing history or computer activity. All user data and session history are deleted when a session ends or the computer restarts.

The Library does not share cookie data or system information with third parties. Website and system data will only be disclosed under a valid court order.

3.6 Wi-Fi

The Library's public Wi-Fi network is provided for convenience and is an open network. Patrons are encouraged to take precautions, such as ensuring HTTPS connections when transmitting sensitive information over the wireless network.

3.7 Hotspots

Mobile hotspots borrowed from the Library do not store or retain any patron information or browsing history.

3.8 Email Service

The Library uses email for transactional and notification purposes. Patrons who provide an email address during registration will automatically receive notifications, such as due date reminders and account updates.

Patrons may opt out of email notices at any time by contacting the Library and requesting a change to their communication preferences.

3.9 Payments

Credit card information provided to the Library is used only for the intended transaction. Payment systems may retain the following non-sensitive information:

- Name
- Email address
- Transaction amount and date
- Service type
- Partial credit card numbers (e.g., last four digits)

The Library does not store full credit card numbers, security codes, or PINs. All payment processing is conducted in compliance with [PCI-DSS standards](#).

3.10 Using Third-Party Vendors

The Howard Miller Library enters into agreements with third parties to provide online services, digital collections, streaming media content, and more. When using some of these services, a patron may also connect with social networks and other users.

Third-party vendors may collect and share a patron's information, including:

- Personally identifiable information a patron knowingly provides. This includes when a patron registers for the site, provides feedback and suggestions, requests information, or creates shared content.
- Other information that could be used to identify a patron. This includes a patron's IP address, search history, location-based data, and device information.
- Non-personally identifiable information. This includes a patron's ad views, analytics, browser information, cookie data, date/time of a request, demographic data, hardware/software type, interaction data, serving domains, page views, and the web page a patron 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 Terms of Use and Privacy Policies for these services. A patron may choose not to use these third-party vendors if a patron does not accept their terms of use and privacy policies.

The Library makes reasonable efforts to ensure that contracts and licenses reflect its policies and legal obligations concerning patron privacy and confidentiality.

3.11 Promotional Materials

The Library may take photos, videos and audio recordings at the Library and during Library events to use in its publicity materials and on its website and social media sites. The Library reserves the right to document its services and the public's use of the Library building and grounds (including on any Library website or social media site).

To ensure the privacy of all individuals, including children, images will not be identified using full names or personal identifying information without written approval from the photographed subject, parent, or legal guardian. Any individual who does not wish the Library to use a photograph or video of them or their child should inform a Library staff member prior to or while such photographs are being taken.

3.12 Video Surveillance

The Howard Miller Library has security cameras maintained by the City of Zeeland that may record activities within and outside the Library. Video recordings will be retained by the City in accordance with the Local Records Act. Video recordings may be subject to release as required by Michigan law.

3.13 Library Materials Selection and Use

It is hereby acknowledged that The Library Privacy Act in MCL 397.605 provides as follows:

- Except as otherwise provided by statute or by a regulation adopted by the governing body of the library, the selection of library materials for inclusion in a library's collection shall be determined only by an employee of the library.
- Except as otherwise provided by law or by a regulation adopted by the governing body of the library, the use of library materials shall be determined only by an employee of the library.

If any individual has a question in regard to the library materials of the Howard Miller Library, the question may be submitted confidentially to the attention of the Library Director.