



Privacy Notice Cumbria Library Service

All of the information you give us will be kept safe and secure whether it is written or on a computer system. We will treat any personal information confidentially and will comply with the Data Protection Act 2018. This means that, if we keep any of your personal data we must:

- tell you what information we need to collect from you
- only use the information for the reason we have agreed with you
- not ask for more information than we need to provide the services
- let you see any information we have collected about you, on request
- keep the information safe, secure and confidential
- personal information will be deleted in accordance with council policy

About Us

Cumbria Library Service is part of Cumbria County Council. Joining the Library is free and enables you to use any of the libraries in Cumbria which are spread across Allerdale, Barrow, Carlisle, Copeland, Eden and South Lakeland. We offer a broad range of online and physical resources which are free to access with a library card which is issued to you when you become a member.

You can find out more about the service and resources we provide at:
www.cumbria.gov.uk/libraries/locations/librarylocations.asp.

Data Collection

Cumbria Library Service will collect and process the categories of data listed below for the following purposes:

- managing your library membership
- receiving and fulfilling requests for library resources
- providing appropriate information, support and services

- service quality and improvement

This data will be collected from you in a number of ways including:

- by telephone
- by email
- in person in a Library location
- online via the Library Service website

Data Categories

The following data is required for your library membership account:

- Name
- Postal Address
- Date of Birth

To receive service and membership notifications by email or text, or to contact you about library/membership issues, we also require:

- Mobile Number
- Telephone Number
- Email Address

We may also collect, store and use the following 'special categories' of more sensitive personal information:

- Gender
- Health i.e. disability
- Financial Details i.e. credit, debit card

Legal Basis for Processing Data

Cumbria Library Service relies on the processing of your personal data (such as name, age, address), and to do this we rely on the following legal bases:

- **GDPR Article 6(1)(c)** processing is necessary for compliance with a legal obligation to which the controller is subject;
- **GDPR Article 6(1)(e)** processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority

When we collect your 'special categories of personal data', (such as health, race, ethnicity, sexual orientation) we rely on the following legal bases:

- **The Equality Act 2010**
- **Public Sector Equality Duty 2011**

Relevant Legislation

These legal bases above are underpinned by acts of legislation that dictate what actions can and should be taken by local authorities, including:

- Libraries and Museums Act 1964

Data Sharing

We may share your information with partner organisations including the Library Management System suppliers (only in the context of administering the library systems).

We may also share some information with the providers of online resources accessed via the Library Services' website. (In this context, some information is shared by the customer directly).

How information is shared with online resource suppliers

Here are the responses from our suppliers with regard to the storage and usage of personal data and information:

Ancestry (provided by ProQuest)

We don't hold any user specific information for Ancestry as access is provided via the institution and patrons are not required to log in. You can find all our privacy information here:

<https://www.proquest.com/about/privacy-home.html>

Borrowbox ebooks and eaudiobooks (provided by Bolinda)

Information: Library barcode number, email address, name if supplied, BorrowBox loan history

Where/how stored: We store and process data in the EEA and in the US. Here's the official communication from our hosting provider on transfer of data from the UK to EEA and non-EEA countries after a no-deal Brexit:

Transfers out of the UK in a "no deal" Brexit. In the event of a "no deal" Brexit, customers transferring personal data from the UK to our Regions in the EEA can rely on the UK government's confirmation that all EEA countries are "adequate" for the purposes of personal data flows and that additional safeguards are not required. The UK government has also confirmed that it recognizes Standard Contractual Clauses as providing an appropriate safeguard for international transfers. Customers transferring personal data from the UK to Regions outside of the EEA can rely on the Standard Contractual Clauses in our AWS Data Processing Addendum. You can read the UK government's guidance on data flows after Brexit here

(<https://www.gov.uk/government/publications/data-protection-law-eu-exit/amendments-to-uk-data-protection-law-in-the-event-the-uk-leaves-the-eu-without-a-deal-on-29-march-2019>).

<https://aws.amazon.com/compliance/gdpr-center/brexit/>

Customer information storage subcontracted? We use Amazon Web Service Cloud for storage

Britannica (provided by Encyclopaedia Britannica UK)

Information: we only hold information given to us by the user when they register for a My Britannica Account. This includes:

First Name

Last Name

Username

Password

E-mail Address (optional)

Security Question (optional)

Where/how stored: Data is stored in accordance with GDPR guidelines. It is stored on Britannica servers in our data centres in the US. However, we are in the process of migrating our data storage to Amazon Web Services (AWS) who are fully GDPR compliant.

Customer information storage subcontracted? as above we currently do not subcontract information storage but we are in the process of migrating to AWS which is a fully GDPR compliant subcontractor.

British Newspaper Archive (provided by JCSOnline)

JCSOnline is the agent for the British Newspaper Archive, acting on behalf of the publisher, and as such are not responsible for holding any individual patron information

Information: BNA - We don't hold information about library customers until they become registered users of the British Newspaper Archive. At which point, they will have had the opportunity to read the British Newspaper Archive privacy statement. If they do not register with British Newspaper Archive, we do not hold any personal data about users.

Where/how stored: British Newspaper Archive has an ISO27001 Information Security Certification. We take a number of precautions to ensure that all customer data is kept secure. All of our customer data is stored on our servers in Aberdeen, Scotland.

Customer information storage subcontracted? BNA - we work with Brightsolid, who maintains our infrastructure and data centres. We do have a number of subcontractors for payment, customer support and CRM services.

British Library Newspapers (provided by Cengage)

Information: end users - we hold none of their personal data in our systems

Where/how stored: Library customers cannot create personal accounts on our site(s)

British Way of Life (provided by 220 Soft)

Information: forename, surname, library card number and which library site/home they accessed the program from

Where/how stored: The company that hosts our website is Stablepoint. Data is stored in the UK

Customer information storage subcontracted? None whatsoever

Findmypast (provided by JCSOnline)

JCSOnline is the agent for Findmypast, acting on behalf of the publisher, and as such are not responsible for holding any individual patron information

Information: FMP - We don't hold information about library customers until they become registered users of Findmypast. At which point, they will have had the opportunity to read the Findmypast privacy. If they do not register with Findmypast, we do not hold any personal data about users.

Where/how stored: Findmypast has an ISO27001 Information Security Certification. We take a number of precautions to ensure that all customer data is kept secure. All of our customer data is stored on our servers in Aberdeen, Scotland.

Customer information storage subcontracted? FMP - we work with Brightsolid, who maintains our infrastructure and data centres. We do have a number of subcontractors for payment, customer support and CRM services.

Oxford Reference Package (provided by Oxford University Press)

Information: OUP holds data of library customers on Oxford DNB, OED, Oxford Reference, Oxford Dictionaries, and gratis Oxford Research Encyclopaedias, Very Short Introduction and Oxford Bibliographies modules. On these systems, usernames are held to allow for sign-in, with secure integration to an access control system for securing passwords. Where purchasing is a website functionality, billing addresses are held within a separate secure database. All data is managed in accordance with OUP's Data Privacy Policy: <https://global.oup.com/privacy?cc=gb>

Where/how stored: For all data collected on European customers, the data is secured, either within AWS instances within the European Union or on-premises.

Customer information storage subcontracted? The websites are hosted by a third party and the access control is provided by a third party, on behalf of OUP. In all cases data is managed with accordance with OUP's Data Privacy Policy: <https://global.oup.com/privacy?cc=gb>

Pressreader (provided by W F Howes)

Information: None, we only hold information from library customers that create a PressReader account (Name and email address). These users personally agree to our [Terms of Use](#) and [Privacy Policy](#) which applies to these users. We are fully GDPR compliant.

Where/how stored: we are a PCI-accredited company. User data is stored on our physical servers, located in Canada.

Customer information storage subcontracted? No, we only store content in the cloud (Azure and other services, which are used as Content Distribution Servers). That means that we do not store user data there

RBdigital eMagazines/eAudio (provided by W F Howes)

Information: The information that we collect and hold falls under three main headings as follows:

1. Information provided by the user: We receive and store the information that users enter at the RBdigital site or give to us in any other way off-line. For example, the information that they provide when they create an account for RBdigital – this means at minimum:
 - Name
 - email address
 - library card number
 together with a username and password of the user's own creation. We also collect any information they provide when they fill out the information in any 'contact us' form on the RBdigital Site. We collect the minimum data set that allows us to deliver the RBdigital Services they choose to use and to assist them through Customer Support if they request it. If they engage our Customer Support team they may collect a phone number and other information specific to resolving the issue. They can always choose not to provide some or all of the information We ask for, but this may prevent them from receiving information or obtaining certain services. Information provided by users is deleted or anonymised after 90 days in the case of 'contact us' and related records and immediately on receipt of a 'forget me' request.
2. Automatic Information and Cookies: Whenever a user interacts with the RBdigital Site, We receive and store certain types of information. For example, We use "Session Storage" or "cookies" to store information when their web browser accesses the Site if permitted by their browser. Alternatively we use a cookie to store session information. The user has full control over cookies using their browser's tools and settings. Session storage information is deleted when they logout or after 30 days, whichever comes first.
3. Log Files:
The RBdigital Site uses cookies to:
 - log IP addresses
 - log browser types
 - track where a user came from
 - track where a user goes on the Site

- identify most popular pages
- identify least popular pages

and other similar types of information for systems administration purposes. The information gathered via these cookies does not directly identify any individual visitor, however, it may render such visitors “indirectly identifiable”. This is because the information collected is typically linked to a pseudonymous identifier associated with the device used to access the Site. Log files associated with these and other Site processes are kept for no more than 60 days

Where/how stored: We use Amazon Web Services (AWS) and RBdigital is operated on a Cloud Infrastructure as a Service (IaaS) basis in full compliance with AWS’ best practice. Data is always encrypted and We use best practices, AWS private networks, IDS systems and monitoring. We also only transmit valuable information via secured channels and secure protocols. AWS has a fully secured and certified environment. The systems and data are hosted in the United States in data centres that are secured and monitored. Our data systems are hosted in AWS in the N. Virginia Data Center (Ashburn Data Center, 21147-21155 Smith Switch Rd, Ashburn, VA 20147, USA).

Amazon ISO27001 Certificate:

https://d1.awsstatic.com/certifications/iso_27001_global_certification.pdf

Amazon's data centre security:

- Perimeter Layer - AWS data center physical security begins at the Perimeter Layer. This Layer includes a number of security features depending on the location, such as security guards, fencing, security feeds, intrusion detection technology, and other security measures.
- Infrastructure Layer - The Infrastructure Layer is the data centre building and the equipment and systems that keep it running. Components like back-up power equipment, the HVAC system, and fire suppression equipment are all part of the Infrastructure Layer. These devices and systems help protect servers and ultimately your data.
- Data Layer - Data Layer Security Protection at Amazon begins by restricting access and maintaining a separation of privilege for each layer. In addition, Amazon deploys threat detection devices, video surveillance and system protocols, further safeguarding this layer.

More information can be found at: <https://aws.amazon.com/compliance/data-center/data-centers/> Since our code is hosted at Amazon, our own locations are not ISO27001 certified. Our technical staff will never visit or perform software updates or maintenance at the Amazon facility.

Customer information storage subcontracted? Only in so far as we use AWS as described above. Customer information is not stored with any other subcontractor.

TheComputerSchool.net (provided by TheComputerSchool.net)

Information: There is no library customer information stored on any of our servers. Library membership card barcode ranges are all we have (barcodes only - no names). When a library member completes a course - they only enter their name and email address for their certificate of completion to be sent. There is no saving of any information after their certificate has been sent. There are no individual logins available for any library member so no personal details are required.

Where/how stored: access is via the Cumbria Library service website, and only requires library membership card number for access (no names or email addresses)

required. Apart from library membership barcode range). We have our own business UK Server.

Customer information storage subcontracted? Absolutely nothing

Theory Test Pro (provided by Well Informed)

Information: Their name and email address

Where/how stored: this information is secured, and it's stored on our website, which is a secure site, registered in the UK

Customer information storage subcontracted? No, we do not share any customer information with third parties

Universal Skills (provided by 220 Soft)

Information: forename, surname, library card number and which library site/home they accessed the program from

Where/how stored: The company that hosts our website is Stablepoint. Data is stored in the UK

Customer information storage subcontracted? None whatsoever

Who Else Writes Like?/Who Next ? (provided by Fiction Explorer)

Information: library patrons - we do not hold any information other than usage stats (ie library card number only)

Where/how stored: Securely stored in the UK

Customer information storage subcontracted? No but the websites are hosted by our website developers, Rock Kitchen Harris and as such, the online resource databases, including customer information as detailed above are stored securely by them within the UK.

We do not sell your information to other organisations. We do not move your information beyond the UK. We do not use your information for automated decision making.

We will sometimes need to share the information we have with other parts of the council or other public bodies or organisations. The council will make all reasonable efforts to contact you if this processing is going to have an impact on rights or privacy.

Data Security and Retention

The information you supply will be kept on a secure council system and can only be accessed by authorised employees within the Library Service.

Your personal information will be deleted, if appropriate, in accordance with our Data Retention Policy. Non-active users who have no charges/ non-returned items are deleted from the Library Management System after 5 years.

Using Your Data

We may contact you using the details you have provided by letter, email or telephone to inform you about:

- stock availability;
- overdue items;
- lost property;
- emergencies i.e. lost child

Please note that you will not be able to unsubscribe from administrative and service-related communications unless you unsubscribe from the relevant services.

If you inform us that you no longer wish to receive the Library's administrative communications we will take steps to avoid contacting you in the future.

Your Rights

Children and adults have the same rights over their personal data which includes:

- The right to access your personal data
- The right to request a correction when information is inaccurate or incomplete
- The right to object to your personal information being processed
- The right to have your personal data erased.

You can amend your library record via our website or by visiting a library in person. If you need to inform us of a name change or address change, please provide relevant proof.

Under the Freedom of Information Act you have the right to request a copy of the information we hold about you by contacting: information.governance@cumbria.gov.uk.

Complaints

If you have any concerns about the information contained in this Privacy Notice, in the first instance please contact: libraries@cumbria.gov.uk

If you have concerns about the way the council has processed your data please contact our Data Protection Officer via dataprotection@cumbria.gov.uk.

You have the right to make a complaint about our handling of your personal data to the Information Commissioner's Office: <https://ico.org.uk/make-a-complaint/your-personal-information-concerns/>.

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