



Dryden Public Library Board

POLICY

SECTION: OPERATIONAL	NO: OP-03
TITLE: Protection of Privacy & Access to Information	Date: June 2026
	Next Review Date: June 2030

1.0 Policy Statement

- 1.1 The Dryden Public Library Board recognizes that individuals have a right to privacy. The Library will make every reasonable effort to protect personal information about its users.
- 1.2 The Dryden Public Library Board upholds the right of the public to access their personal information held by the Library. The Board is also committed to making information about Library governance and operations accessible to the public.

2.0 Legislative Responsibilities

- 2.1 The Library Board is responsible for ensuring that the Library follows all the requirements of the *Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c. M56 (MFIPPA)* and the *Freedom of Information and Protection of Privacy Act (FIPPA)*.
- 2.2 The Board will ensure that:
 - 2.2.1 The Library complies with the spirit, principles, and intent of the Acts.
 - 2.2.2 Members of the public have access to information about the operations of the Library and to their own personal information held by the Library.
 - 2.2.3 The privacy of an individual's personal information is protected.

3.0 Information Management Policies

- 3.1 The Dryden Public Library Board adopts the following City of Dryden Policies as their own:
 - 3.1.1 [MU-IN-02 Email](#)
 - 3.1.2 [MU-IN-05 Freedom of Information \(FOI\) and Protection of Privacy Policy](#)
 - 3.1.3 [MU-IN-12 Electronic Monitoring Policy](#)

4.0 Collection of Personal Information

- 4.1 The Dryden Public Library collects personal information about identifiable individuals in electronic and/or hard copy formats including:
 - 4.1.1 Name, address, email addresses, telephone numbers.

- 4.1.2 Library card numbers, borrowing and hold history, and fines.
- 4.1.3 Interlibrary loan and purchase requests.
- 4.1.4 Photographs and photo releases.
- 4.1.5 Comment forms, patron surveys, and program evaluations.
- 4.1.6 Program registration forms.
- 4.1.7 Computer and bathroom sign-in sheets.
- 4.1.8 Private or confidential correspondence

4.2 All comments received by the Board are part of the Board's public documents except for comments shared as a part of an in-camera session.

4.3 The Dryden Public Library subscribes to third-party vendors for the provision of digital collection, online resources, and software services.

- 4.3.1 These services may collect or have access to an individual's personal information.
- 4.3.2 The Library cannot monitor or control information held on third-party servers.
- 4.3.3 We will make every effort to choose third-party vendors with clear privacy policies and demonstrated commitment to privacy protection. Preference may be given to vendors who comply with the American Library Association's *Library Privacy Guidelines for E-Book Lending and Digital Content Vendors*.

4.4 The Dryden Public Library Board is responsible for personal information under its control and names the CEO as the individual responsible for the organization's compliance. The CEO makes sure of that:

- 4.4.1 Staff are trained in privacy protection.
- 4.4.2 The collection of personal information is limited to what is necessary for the proper management of the Library and the provision of services.
- 4.4.3 The purposes for which personal information is collected from a person is identified by the Library staff at, or before, the time the information is collected and that consent to collect the information is given by the individual.
- 4.4.4 Consent is obtained before personal information is used for a purpose other than for which it was received.
- 4.4.5 Personal information is not kept longer than is necessary for the provision of library services and that procedures for the keeping and disposal of personal information are established and followed.
- 4.4.6 Personal information will be as correct, complete, and up to date as is necessary.
- 4.4.7 Personal information will be protected by security safeguards appropriate to the sensitivity of the information.
- 4.4.8 Procedures around taking and using photographs are maintained. The procedures must ensure compliance with legislative requirements and the principles included within this policy.

4.4.9 The Annual Statistics Report to the Privacy Commission of Ontario is submitted.

4.5 The Dryden Public Library will not share an individual's personal information without their consent, subject to certain exemptions as given by MFIPPA. Information will be shared:

4.5.1 With a custodial parent or guardian of a person up to 16 years of age.

4.5.2 Upon the presentation of a search warrant.

4.5.3 At the CEO's discretion:

4.5.3.1 With the police without a search warrant to aid in an investigation

4.5.3.2 For compassionate reasons to help contact family or friends of an individual who is hurt, ill or missing.

4.5.4 If consent is gained in compliance with the Library's photograph procedures.

5.0 Access to Information

5.1 Individuals may, at any time, request information related to the existence, use and disclosure of their personal information by contacting the CEO.

5.2 Individuals may request information on Library governance and operations following the process outlined in *MU-IN-05 Freedom of Information (FOI) and Protection of Privacy*.

5.3 The CEO shall work with the City of Dryden's Freedom of Information (FOI) Coordinator to respond to requests.

6.0 Breach of Privacy

6.1 A breach of privacy is any unauthorized or illegal collection, use or disclosure of personal information.

6.2 In the event of a breach the CEO will follow the directives found in City of Dryden Policy *MU-IN-05 Freedom of Information (FOI) and Protection of Privacy*. They will also notify the Information and Privacy Commissioner as required.

Related Documents:

Dryden Public Library *OP-01 Circulation Policy*

City of Dryden Corporate Policy Manual *MU-IN Information Management*

Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c. M56

Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, Regulation 823

Information and Privacy Commissioner of Ontario. *What are the Privacy Responsibilities of Public Libraries?* 2002.

American Library Association. *Library Privacy Guidelines for Ebook Lending and Digital Content Vendors*. 2015.

Dryden Public Library Photograph Procedures

History			
Approval Date:	January 2023	Approved by:	M Benson
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