

Statement of Values:

The Manchester Community Library believes the right to privacy is essential to free inquiry, thought, speech, and association. All Library users should be free to select, explore, and consider information for themselves without fear of censure, judgment, or punishment. The Library upholds the [ALA Code of Ethics](#) and [Library Bill of Rights](#). The Manchester Community Library does not sell any library user data or share user data with other organizations except in cases where the Library partners with said organizations to provide services (e.g., sharing RSVPs to an off-site event with event hosts).

Library Privacy Regulations

The ethics of the field of library science and the laws of the state of Vermont ([22 V.S.A. § 172](#)) provide for the confidentiality of library members' registration and borrowing records. As such, Library staff keep confidential records of membership and the borrowing activities tied to each account. Member registrations and borrowing records are available only to staff and agents of the Library to the extent necessary to administer Library services.

Library members may make corrections and updates to the Library's records of their contact information and other personal details by logging into the catalog and visiting the [My Account](#) page. Because membership information is kept confidential, updating personal details in the catalog does not carry over to other Library systems, such as the newsletter or donor database. Please [contact the Library directly](#) for assistance updating these systems.

Household Memberships and Privacy of Records

Please see the Membership page for information about the kinds of memberships available at the Library. A family living together may set up a household Library

membership, each with a library card. The membership is billed (for non-resident members) and renewed as a single unit. In this case, membership and borrowing records are kept separately and confidentially, except for messages related to membership renewal. Each individual's records are not available to other household members (except to parents/guardians of children under 12, as specified under Records of Members Under Age 12, see below).

A household membership can also be arranged such that one adult is the primary borrower named on the account, and this individual specifies the other adults/children residing with them who are authorized borrowers on their card/account. In this case, the non-primary borrowers can check out materials from the Library on the card, but only the primary borrower will be allowed access to account records. The primary borrower will be able to see what materials other authorized borrowers on that card have used the account to access.

Members over the age of 12 may authorize someone else in writing to borrow items on their membership by filling out a [Library Card Access Permission Form](#). This authorization will be in effect until canceled. All items borrowed during this time are the responsibility of the member. If a member over the age of 12 cannot complete a written authorization and requires assistance to manage their Library membership, their custodial parent or legal guardian may present paperwork—usually court documents—demonstrating the custodial arrangement to be authorized on the account.

If a judicial order or warrant directs disclosure, the Library may be required to share your information with the relevant authorities. No confidential information on Library members will be revealed to law enforcement without presenting an authorized judicial order or warrant directing disclosure.

The Library will only create and renew household memberships according to the structure described in the first paragraph of this section. Library members who currently have household memberships structured according to the second paragraph may visit the Help Desk to request that their accounts be changed to give each household member their card during any of the Library's open hours and will be asked to do so at the time of the next renewal of their membership if they have not done so by that time.

Records of Members Under Age 12

Custodial parents and guardians of Library members under 12 may reference their children's Library records and borrow and return materials on their children's behalf. [22 V.S.A. § 172](#) provides for disclosing library users' membership and borrowing records to custodial parents or guardians. The Library has the right to take reasonable steps to verify that the person attempting to access the membership is a custodial parent or guardian of the child they are inquiring about before providing the records, including by asking for photo identification.

Once a Library member turns 12, custodial parents and guardians will no longer be granted permission to view that member's records, including records from before the member turned 12. [Act 150, S.220](#) sets the age of confidentiality at 12.

Deletion of Member Records

Library memberships that have expired and been inactive for two years are purged from Library records unless there is an outstanding fine related to overdue materials. Library members who wish to purge their membership records before the account expires and two years have passed may request that the records be deleted by submitting a [Request for Data Deletion](#). The Library has the right to take reasonable steps to verify that the person submitting the request is the membership owner before deleting the records,

including by asking for photo identification. Members requesting deletion must settle outstanding fees owed to the Library before the records are deleted.

Recording Images and Video

Library staff and volunteers take photos and videos to document events and proceedings and share them with the community. Users of the Library may also record images, audio, and video in Library spaces where there is no reasonable expectation of privacy (e.g., common areas of the Library including, but not limited to, entrances, near book and media collections, public seating, delivery areas, and parking lots. Recording is not permitted in areas where staff and the public have a reasonable expectation of privacy (e.g., restrooms and study rooms), and it is not permitted to record in such a way as to intentionally identify a person's reading, viewing, or listening activities in the Library.

Recordings and photographs taken by Library staff may be uploaded to the Library's online channels, e.g., the Library website, YouTube channel, social media channels, and GNAT-TV. Library staff will take reasonable steps to avoid posting recordings or photographs identifying a person's reading, viewing, or listening activities. Library users may opt out of themselves and/or their minor children being photographed/recorded by Library staff by approaching the photographer and requesting to be excluded from recording for that event or day. Library users requesting this exemption will be asked to complete a [Recording Exemption Form](#).

If you would like a photograph or recording of you to be removed from our website or social media accounts, please let us know via the [Request for Data Deletion](#). Library staff will respond to requests for deletion within five business days. Where possible, please provide a link to where the media is displayed.

If you have a great photo or footage of Library activities or of you or someone you know enjoying one of our events, we would love to take a look. Send it in, and we might feature it online.

Tip: If you upload or otherwise transmit your images to the Manchester Community Library and permit us to post them on the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Visitors can download and extract any location data from images on the website.

Security Cameras

The Manchester Community Library operates security cameras on the exterior and interior of the building to increase the safety of Library users, staff, and property; to discourage violations of Library rules of conduct; and, where necessary, to assist Library staff or law enforcement in following up on violations of Library policy or the law, respectively. This policy should be interpreted with the understanding that the image of a person on library property is not protected. Anything identifying the content of a library user's account is protected and held private.

Signage posted at the Library's entrances notifies the public that security cameras are in use. Cameras may be installed in locations where staff and patrons would not expect privacy. Examples include common areas of the Library such as entrances, near book and media collections, public seating, delivery areas, and parking lots. Cameras will not be installed in areas where staff and users have a reasonable expectation of privacy, such as restrooms and study rooms, nor are they positioned to intentionally identify a person's reading, viewing, or listening activities in the library. Cameras will not be installed to monitor staff performance.

Staff may have access to real-time video monitors. The monitors are located in secure areas to ensure privacy. Designated staff may additionally access stored footage in pursuit of documented incidents of criminal activity or violation of the Library's rules of conduct. Staff designated to access stored footage are the Executive and Associate Directors, Facilities Manager, and other individuals designated by the Executive Director.

Library user access to video footage is only allowed with a valid court order. For investigations initiated by law enforcement agencies, recorded data will be made available to law enforcement upon presentation of a valid court order or subpoena establishing probable cause to review the data. However, in emergencies that present an imminent danger of physical harm, law enforcement may gain access without a court order. In such imminent danger emergencies where law enforcement calls for a waiver of the court order, the requesting officer must provide their name, agency, badge number, the nature of the emergency, and the extent of data requested.

Production of video copies for distribution is limited to designated staff as specified above and may only be carried out with permission from the Executive or Assistant Director.

Images will be stored for a length of time based on available storage, but 30 days at maximum, except when retention is specifically requested by someone with authority to access recordings as specified in this policy or for images used in ban-and-bar documentation. As new images are recorded, the oldest images will be automatically deleted. The length of storage time varies depending on the camera's memory and recording length.

In situations involving banned-and-barred users, stored still images may be shared with staff system-wide. Shared images may remain posted in restricted staff areas for the banning period. After the ban ends, these images will be archived in the administrative offices for five years.

Because security cameras are not constantly monitored, staff and library users should take appropriate precautions to protect their personal property and safety. The Manchester Community Library is not responsible for property loss or personal injury.

Public Computers and Wi-Fi

The Library does not monitor individual users' online behavior on public computers or personal devices connected to our public Wi-Fi. Custodial parents and guardians of children under 12 are responsible for monitoring their children's use of Library technology. Users should be aware that, in some cases, third parties can gain access to information transmitted over a public wireless network, and users accept this risk by using the Library's free wireless internet service.

Public computers are set up to delete browsing history and cached data daily. Still, users always have the option to delete their browsing data at the end of a computer session to ensure subsequent users that day will not see it. It is the user's responsibility to delete their browsing data at the end of a computer session if so desired. If you are unsure how to do this, you can request help from Library staff at the Help Desk.

Library Website

Contact Forms and Event Registrations

Information submitted via web forms is only shared with other organizations as necessary to provide the service the form is requesting (e.g., registering you for an event or joint/co-sponsored event or answering a request for technical support). Most fields on these forms are optional, and users are not required to submit personally identifying information except to such an extent as it will help staff contact them to follow up on their inquiries. Form submission data is not used for the Library's advertising or solicitation purposes unless the user grants that permission, usually by ticking a checkbox that indicates their willingness to share their data for this purpose.

Form submission data is stored on the Library's web server for up to 90 days before being deleted. Emails about form submissions, such as the email receipts you might receive to confirm you have submitted a form, may be stored longer than that by their recipients (i.e., you), Library staff, and email service providers.

Embedded Content from Other Websites

Pages on the Library website may include embedded content (e.g. videos, images, and articles). Embedded content from other websites behaves in the same way as if the user has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

Aggregate Data

The Library collects aggregate data about how library users interact with our services, including but not limited to:

- the number of people who visit our premises each day, and the number of people who use particular services like the public computers and wi-fi,
- the number of people who attend events at the library,
- the number of people who visit our website and who visit particular pages on it,
- the number of people who view and like our social media posts, and watch our online videos, and
- the number of people who subscribe to and open our digital newsletters.

The Library uses these numbers as statistics to help measure the success of our services but does not report library users' names or other identifying data in these records. All paper records of who used a service, such as sign-in sheets for public computers, are destroyed after their entries are counted at the end of each business week.

Data Breach Procedures

The Manchester Community Library takes user privacy seriously and takes multiple measures to ensure no one gains unauthorized access to user data. If such a breach is discovered, the Library will immediately work to establish what data was affected, when,

and how; will take steps to remove all unauthorized access from Library systems; will notify all library users whose personal data was affected by the breach; and will post a public notice of the breach. After all of these steps are completed, Library staff will review the breach event to decide what measures can be taken to prevent a recurrence of the event.