

Boone County Public Library Protection of Personal Information Policy

Created March 2015

Reviewed April 2015; February 2016; February 2017; April 2018

Approved May 2015; April 2018

In accordance with [KRS 61.931-934](#) , Boone County Public Library will take reasonable precaution to ensure that any personal information that is kept by the Library for any purpose is safeguarded from unauthorized access.

Boone County Public Library will comply with best practices established by the Department for Local Government (as required in [KRS 61.932](#)). See [Security and Incident Investigation Procedures and Practices for Local Governmental Units](#) for these best practices.

Per the Department of Local Government's guidance, a "Point of Contact" is designated by Boone County Public Library to

1. Maintain the library's adopted Information Security Policy and be familiar with its requirements;
2. Educate the library's employees and others with access to personal information so they are aware of and understand the Information Security Policy;
3. Serve as contact for inquiries from other agencies regarding its Information Security Policy and any incidents;
4. Be responsible for ensuring compliance with the Information Security Policy; and
5. Be responsible for responding to any incidents.

Patricia Yannarella is Boone County Public Library's Point of Contact for the purpose of adherence to Department for Local Government guidance.

Customer information

Boone County Public Library acts to limit the amount of personally identifiable information that it retains. Some information, however, is necessarily and understandably retained for the transaction of day-to-day business.

Most information related to customers is kept for the purposes of circulating materials and ensuring that responsibility is attributed to the correct person when an item is borrowed. This information is not publicly available and, beyond interactions between the library and the customer, will be shared only with third-party vendors with whom the library has contracted services necessary for conducting business and law enforcement personnel upon valid, legal request. Information related to delinquent customers may be shared with a third party vendor for the purposes of collection. The library will not share personally identifiable customer information for any other purpose.

When a customer record has been inactive for three (3) years and carries no outstanding debt (financial or in borrowed materials), the record is deleted from the Library's computer system and is not archived.

Personal information about customers is generally only retained in electronic format with appropriate back-up devices in place for recovery in the event of a database failure. All back-up devices are kept secured at all times in areas that are not accessible to the general public and with limited accessibility by staff.

Staff information

Boone County Public Library retains information about its staff that is directly related to the work environment. Social security numbers, health information, and performance records are retained only as a part of standard human resources processes (such as payroll, retirement, or health insurance). This information is subject to records retention policies of the Commonwealth of Kentucky and Boone County Public Library. Records will be retained and destroyed according to the records retention schedule.

Personal information about staff members is, in some cases, subject to the Open Records Act and will be shared with anyone properly requesting that information as specified by Kentucky Revised Statute. Information protected from disclosure under the Open Records Act will not be shared with any outside agency for any purpose other than for the reason it was collected (i.e. to a payroll vendor for tax purposes).

Personal information about staff will be kept secured at all times in areas that are not accessible to the general public and with limited accessibility by staff.

Security Measures

The library does not share any information with any outside agency for any reason other than the purposes for which it was collected. Third party vendors with whom the library does business are required by [KRS 61.932](#) to provide their own security measures to protect any personal information. Where possible, the library has informed each entity in writing that appropriate security and breach notification is required.

The library provides an internal, closed network for the collection and use of most customer data. The network is not accessible to the general public and access to it is limited to third party vendors with whom the library has contracted services.

Where the library's systems do have interaction with any outside vendor or customer (i.e. through the internet-based catalog), transactions will take place using secure transmission protocols. Such interactions will be limited to the purpose of the transaction only and will not allow access to any more information than is required for the purpose of the transaction (i.e. a customer reviewing a list of items that are currently checked out to him/her).

Personal information stored on computers or back-up devices is not made available to the general public and is subject to a computer firewall and anti-virus systems.

Security Breaches and Notifications

If Boone County Public Library becomes aware of a breach that would allow outside access to its network or access to devices used to store personal information, action will be taken promptly to remove the device from the network or to close the network to all external traffic.

Boone County Public Library will notify vendors of their responsibilities to inform the library of any breach in their own systems which would expose or compromise the security of personal information provided by the library. Notification of such must conform to the requirements of [KRS 61.932](#) and will include any reports of investigations that are conducted into the breach. Contracts that are made or amended with the library after January 1, 2015 must contain provisions to account for the requirements under [KRS 61.932](#).

In the event Boone County Public Library's own computer network or data storage systems are breached, the library will promptly take action to secure the network or system, to prohibit any off-site access, and to determine the extent of the data that was obtained by the unauthorized party. Where appropriate, the library will notify any/all affected parties within the guidelines of [KRS 61.933](#) or as directed in guidance from the Department for Local Government. Investigations which follow such a breach will be reported as required by the same statute.