

# American University Library

## Privacy Policy for Users

### I. Introduction

American University Library (“Library”) is committed to protecting the privacy and confidentiality of its users. This policy is in compliance with applicable federal, state, and local laws, as well as American University’s institutional policies such as the Academic Regulations on Confidentiality of Student Records (FERPA).

Our commitment to privacy and confidentiality has deep roots not only in law but also in the ethics and practices of librarianship. In accordance with the American Library Association’s Code of Ethics:

“We protect each library user’s right to privacy and confidentiality with respect to information sought or received and resources consulted, borrowed, acquired, or transmitted.”

### II. American University Library’s Commitment to Users’ Rights of Privacy and Confidentiality

American University Library takes reasonable steps to protect user privacy when library resources are used, and how the Library deals with personally identifiable information collected from users.

#### 1. Notice & Openness

American University Library informs its users about the policies governing the amount and retention of personally identifiable information, and about why that information is necessary for the provision of library services through its privacy and information-gathering policies on the American University Library Web site.

*American University Library:* American University Library may gather information about current and valid library users for the purpose of providing library services. Where it is necessary for the Library to identify users, it is our goal to gather only the minimum information necessary and to retain that information for only as long as it is needed to complete a particular transaction. Some documentation such as Special Collections user registration information may be kept in perpetuity to safeguard library collections. In all cases we try to avoid creating unnecessary records, we try to avoid retaining records not needed for the fulfillment of the mission of the library, and we do not engage in practices that might place information in or on public view.

*The Washington Research Library Consortium (WRLC):* American University Library participates in the Washington Research Library Consortium. WRLC provides American University Library with numerous services, including maintaining our ALADIN system, which includes our user records (patron database). This relationship enables us to provide essential library services, including: circulating library materials to our users; enabling AU students, staff and faculty to borrow materials

from other consortium libraries; providing access to our subscription databases; and delivering shared library services, such as virtual reference.

In order to provide these services, it is necessary that the WRLC have access to American University Library's individual users' personal information. The WRLC abides by the *WRLC ALADIN System Privacy Policy* [<http://www.wrlc.org/privacypolicy.html>]. Furthermore, the participating members in the WRLC have agreed to maintain the confidentiality of personal records maintained in the shared user database (*Washington Research Library Consortium Participant Agreement as amended May 2004*, p. 3). Since many of American University Library's systems are administered by WRLC, this privacy policy should be read in conjunction with the *WRLC ALADIN System Privacy Policy*. For the purposes of this policy, it should be understood that WRLC is an exception to statements concerning third parties.

## **2. Choice and Consent**

American University Library will keep all personal information confidential. The Library will not sell or license personal information. The Library will not disclose personal information to any third party without the user's consent, unless permitted by this or any University policy; compelled to do so under the law; or to comply with a legally issued subpoena. Almost all of the library's subscription databases are accessed through ALADIN by IP Address or through the WRLC proxy server. This method of access allows personal information to be protected from vendors. In those instances in which a third party vendor requires personal information from users in order for them to access a subscription service, the library enables users to supply personal information to vendors directly if the user so chooses.

To receive borrowing privileges, American University Library must obtain certain information about a user in order to provide a library account. This information may include name, university identification number, library card barcode number, phone number, and home address. To use licensed subscription electronic resources, users are required to submit a name and university identification number to be authenticated as a currently affiliated user if they are off-campus at the time of access.

For users affiliated with American University, the Library automatically receives personally identifiable information to create and update a library account from the Office of the Registrar (for students) or the Office of Human Resources (for employees).

User accounts contain an official email address and mailing address supplied by the University. Users have the option of providing a different email address for the purpose of receiving notifications about library accounts. Users may also have the option of removing an e-mail address.

In an effort to improve library services, the Library may use personally identifiable information for library assessment and marketing purposes.

## **3. Access by Users**

Individuals who use library services that require the function and process of personally identifiable information are entitled to view their information. Users may view personal information online or in person and users may update personal information in person. Before viewing personal information

or providing updated information, a user will be asked for an identification number or card to ensure verification of identity.

The purpose of accessing and updating personally identifiable information is to ensure that library operations can function properly. Such functions may include notification of overdue items, recalls, reminders, etc. Upon request, American University Library will explain the process of accessing or updating user information so that all personally identifiable information is accurate and up to date.

#### **4. Data Integrity & Security**

*Data Integrity:* The data collected and maintained at American University Library must be accurate and secure. The Library takes reasonable steps to assure data integrity, including but not limited to: using only reputable sources of data; providing users access to their own personally identifiable data through the personal library page (MyALADIN); updating data whenever possible; utilizing authentication systems that authorize use without retaining personally identifiable information; and destroying obsolete data or converting it to anonymous form.

*Data Retention:* American University Library takes reasonable steps to protect personally identifiable information from unauthorized disclosure once it is no longer needed to manage library services or collections. Information that should be regularly purged or shredded includes but is not limited to personally identifiable information on library resource use, material circulation history, and security/surveillance logs. When necessary, the Library works with the Washington Research Library Consortium to purge information housed on the WRLC network.

*Tracking Users:* American University Library encourages the WRLC to remove links between user records and materials borrowed when items are returned and any fines have been settled, and to delete records as soon as the original purpose for data collection has been satisfied. The Library permits in-house access to information in most formats without creating a data trail. American University Library has invested in appropriate technology to reasonably protect the security of any personally identifiable information while it is in the library's custody, and the Library takes reasonable measures to ensure that aggregate, summary data is stripped of personally identifiable information.

The Library does not ask library users to identify themselves or reveal any personal information unless they are borrowing materials, requesting special services, accessing the building during restricted hours, or involved in incidents relating to security, safety, or conduct. Users making remote use from outside the library of those portions of the Library's Web site restricted to registered users under license agreements or other special arrangements may also be required to provide identity information. The Library regularly removes cookies, Web search history, cached files, or other computer/Internet use records, and other software code that are placed on library computers or networks.

*Third Party Security:* We take reasonable measures to ensure that American University Library's contracts, licenses, and offsite computer service arrangements reflect Library policies and legal obligations concerning user privacy and confidentiality. Should a third party require access to our users' personally identifiable information, Library agreements address appropriate restrictions on the use, aggregation, dissemination, and sale of that information. When connecting to licensed databases

outside the library, the Library releases only information that authenticates users as authorized users. The Library may identify and contact any user who may be in breach of such a license.

*Cookies:* Users of networked computers will need to enable cookies in order to access a number of resources available through the library. A cookie is a small file sent to the browser by a Web site each time that site is visited. Cookies are stored on the user's computer and can potentially transmit personal information. Cookies are often used to remember information about preferences and pages visited. The user can refuse to accept cookies, can disable cookies, and remove cookies from his/her hard drive. However, disabling or refusing to accept cookies may render some subscription databases unusable. American University Library's servers use cookies solely to verify that a person is an authorized user in order to allow access to licensed library resources and to customize Web pages to that user's specification. Cookies sent by the library servers are deleted when the user's computer browser is closed. The Library will not share cookies information with external third parties.

*Security Measures:* American University Library's security measures involve both managerial and technical policies and procedures to reasonably protect against loss and the unauthorized access, destruction, use, or disclosure of the data. The Library's managerial measures include but are not limited to internal organizational procedures that limit access to data and ensure that those individuals with access do not utilize the data for unauthorized purposes. The Library's technical security measures to reasonably prevent unauthorized access include but are not limited to encryption in the transmission and storage of data; limits on access through use of passwords; and storage of data on secure servers or computers that are inaccessible from a modem or network connection.

*Staff Access to Personal Data:* American University Library permits only authorized Library staff with assigned confidential passwords to access personal data stored in the Library's computer system for the purpose of performing library work.

*Washington Research Library Consortium:* Much of the personal information collected by American University Library is stored and processed on the WRLC servers. American University Library works with the WRLC to ensure the privacy protection of users.

## **5. Enforcement & Redress**

The Library conducts periodic privacy audits in order to ensure that all library programs and services are in compliance with the Library's privacy policy. Library users who have questions or concerns about this policy should contact the Associate University Librarian for Information Services.

The American University Library authorizes only the University Librarian, the Associate University Librarian for Information Services, or the Assistant University Librarian for Collections Services to receive requests from law enforcement officers. Before responding to any law enforcement requests, the Library must confer with the Office of General Counsel to determine the appropriate response. Generally, the Library does not make library records available to any agency of state, federal, or local government unless a subpoena, warrant, court order or other investigatory document is issued by a court of competent jurisdiction that shows good cause and is in proper form. All library staff refer any law enforcement inquiries to the Assistant University Librarian for Collections Services, the Associate University Librarian for Information Services, or the University Librarian. In the event

that these library administrators cannot be contacted, library staff immediately refer any inquiries to General Counsel.

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*Based on the "Model Privacy Policy" of the Intellectual Freedom Office of the American Library Association*  
(<http://www.ala.org/Template.cfm?Section=Privacy1&Template=/ContentManagement/ContentDisplay.cfm&ContentID=43556#modelprivacy>)

*Accessed 2/16/05.*

Approved by User Services Team – July 26, 2005

Draft subject to review by University Counsel; approved for limited distribution by University Librarian –  
September 12, 2005

Revised draft approved by University Counsel – March 31, 2006

Revised draft approved by User Services Team – June 13, 2006

Revised draft approved by University Librarian – June 13, 2006