



HILLINGDON

LONDON

DATA PROTECTION PRIVACY NOTICE FOR HILLINGDON LIBRARY SERVICE

Why are we providing this Notice to you

The Council, in its capacity of Data Controller, holds certain information about you ("personal data") which it needs to process for the purpose of providing the library service to its members. This Notice is designed to give you information about the personal data we hold about you, how we will use it, your rights in relation to it and the safeguards that are in place to protect it.

Further information is contained in the Council's Generic Data Protection Privacy Notice which can be found [on its website](#).

What personal data do we hold

As a member of the library, the types of data we hold and process will typically include:

- Your contact details, including name, address, email and phone number
- Your title, gender and age
- Preferred languages

The above data is obtained directly from you when you join and when you provide updates changing address.

In addition, as a library member we hold and process:

- Items you have on loan
- Items you have borrowed previously
- Fees and charges you have paid or that are outstanding
- Notes to update library staff with reminders and changes to your status
- Data on library public computer use

This data is obtained automatically via your use of library services, or updated manually by staff accessing your records in relation to your use and membership of the library.

What is our purpose for processing your personal data

The data we collect and process when you join the library enables the library service to contact you and keep a record of items on loan, items reserved and charges owed to the council.

Data collected through any use of library public computers enables the library service to collect statistics on use and ensure policies and guidelines are being adhered to.

If we intend to process your personal data for a purpose other than that for which the personal data was collected, we shall provide you details of that other purpose before we start processing your data.

What is the legal basis for our use of your personal data

- We have obtained your freely given and specific consent and have informed you that you have the right to withdraw it at any time
- We need it to perform a task in the public interest

What we do if your personal data is sensitive

We will only process your sensitive personal data with your consent, unless we can lawfully process it for another reason permitted by law. We will notify you if it is sensitive and as with non-sensitive personal data, you have the right to withdraw your consent to processing at any time by letting us know. Sensitive data is data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic and biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

Please note that none of this information is held or processed by the library service in the normal course of a subject's membership and usage of the library.

For how long will we hold your personal data

We will only keep your personal data for as long as we need to in order to fulfil the purposes for which it is collected and for so long afterwards as we consider it may be required to deal with any questions or complaints about the service which we provide to you, unless we elect to retain your data for a longer period in order to comply with our legal and regulatory obligations.

Organisations that we may share your personal data with

The library service will not share your personal data with any outside organisations without your consent, unless we need to comply with a legal obligation.

In accessing some of our online resources, you will be required to provide your library membership information to them.

Your rights

You have a right to access and obtain a copy of the personal data that we hold about you and to ask us to correct your personal data if there are any errors or it is out of date. In

some circumstances, you may also have a right to ask us to restrict processing of your data until any errors are corrected, to object to processing or to transfer or in very limited circumstances erase your personal data. You can obtain further information about these rights from the Information Commissioner's Office at: www.ico.org.uk or via their telephone helpline 0303 123 1113.

If you wish to exercise any of these rights and branch staff are unable to help, please contact:

Darren Deeks, Library Operations Manager
Uxbridge Library, High Street
Uxbridge UB8 1HD
ddeeks@hillingdon.gov.uk
01895 250714

You also have the right to lodge a complaint in relation to this Privacy Notice or our processing activities with the Information Commissioner's Office, which you can do through the website above or their telephone helpline.

We may from time to time ask for further information from you. If you do not provide such information, or ask that the personal data we already hold is deleted or restricted, this may affect the service that we provide to you.

Updates

We may update this notice periodically. Where we do this, we will inform you of the changes and the date on which the changes take effect.

For more information on how we hold and process your data please visit [the library webpage](#).

Update relating to processing of personal data during COVID-19

We have updated this privacy notice to reflect that we have been mandated by law to collect and keep a limited record of staff, members of the library and visitors who come onto our libraries for the purpose of contact tracing to support NHS Test and Trace (which is part of the Department for Health and Social Care) in England.

By maintaining records of staff, members of the library and visitors, and sharing these with NHS Test and Trace where requested, we can help to identify people who may have been exposed to Coronavirus.

As a member of the library or visitor, you will be asked to provide some basic information and contact details. (This does not apply where you have 'checked in' using the NHS Covid-19 app or your visit is exempt). The following information will be collected:

- the names of all members of the library or visitors, or if it is a group of people, the name of one member of the group;

- a contact telephone number for each member of the library or visitor, or for the lead member of a group of people;
- email address (if the member of the library or visitor is unable to provide a telephone number);
- a postal address (if the member of the library or visitor is unable to provide an email address);
- date of visit, arrival time and departure time to the library

The London Borough of Hillingdon as the data controller for the collection of your personal data, will be responsible for compliance with data protection legislation for the period of time it holds the information. When that information is requested by the NHS Test and Trace service, the service would at this point be responsible for compliance with data protection legislation for that period of time.

The NHS Test and Trace service as part of safeguarding your personal data, has in place technical, organisational and administrative security measures to protect your personal information that it receives from London Borough of Hillingdon, that it holds from loss, misuse, and unauthorised access, disclosure, alteration and destruction.

In addition, if you only interact with one member of staff during your visit, the name of the assigned staff member will be recorded alongside your information.

NHS Test and Trace have asked us to retain this information for 21 days from the date of your visit, to enable contact tracing to be carried out by NHS Test and Trace during that period. We will only share information with NHS Test and Trace if it is specifically requested by them.

For example, if another member or visitor at the Library reported symptoms and subsequently tested positive, NHS Test and Trace can request the log of member or visitor details for a particular time period (for example, this may be all members or visitors who visited on a particular day or time-band, or over a 2-day period).

Under government guidance, the information we collect may include information which we would not ordinarily collect from you and which we therefore collect only for the purpose of contact tracing. Information of this type will not be used for other purposes, and NHS Test and Trace will not disclose this information to any third party unless required to do so by law (for example, as a result of receiving a court order). In addition, where the information is only collected for the purpose of contact tracing, it will be destroyed by us 21 days after the date of your visit.

However, the government guidance may also cover information that we would usually collect and hold onto as part of our ordinary dealings with you (perhaps, for example, your name, date of birth and phone number). Where this is the case, this information only will continue to be held after 21 days and we will use it as we usually would, unless and until you tell us not to.

Your information will always be stored and used in compliance with the relevant data protection legislation.

The use of your information is covered by the General Data Protection Regulations Article 6 (1) (c) – a legal obligation to which we are subject to because the venue is a Library. The legal obligation to which we are subject, means that we are mandated by law, by a set of new

regulations (The Health Protection (Coronavirus, Collection of Contact Details etc and Related Requirements) Regulations 2020), from the government, to co-operate with the NHS Test and Trace service. This is in order to help maintain a safe operating environment and to help fight any local outbreak of corona virus.

Contacting us

Please contact librarycontact@hillington.gov.uk for further information.

Statutory Data Protection Officer

You may also contact our data protection officer for further information:

Raj Alagh, Borough Solicitor and Monitoring Officer

Data Protection Officer

Civic Centre

High Street

Uxbridge

UB8 1UW

E-mail: ralagh@hillington.gov.uk Telephone: 01895 250617