



POLICY

POLICY TITLE: Privacy Policy
APPROVED BY: SALS Board of Trustees [insert date]
MVLS Board of Trustees [insert date]

EFFECTIVE DATE: TBD
New Policy: Revised Policy: Date Revised:

1. Our Commitment to Your Privacy

Mohawk Valley Library System (MVLS) and Southern Adirondack Library System (SALS), together through the Joint Automation Project (JA), which refers to the shared technology and automation services operated on behalf of participating member libraries, (collectively, “JA,” “we,” or “us”), are committed to protecting the privacy and confidentiality of our patrons, visitors, program participants, donors, and staff. Privacy is essential to intellectual freedom, free inquiry, and the ability to access information without fear of surveillance or disclosure. Participating member libraries may maintain separate local privacy, circulation, or data use policies governing services and interactions provided directly by those libraries. Users are encouraged to consult the policies of their home or service-providing library for additional details.

This Privacy Policy explains:

1. What information we collect
2. Why we collect it
3. How the data is or might be collected
4. How it is used
5. When it may be shared
6. How it is protected

This policy applies to information collected in person and online, including through our websites, catalog systems, digital resources, and communications.

We adhere to New York Civil Practice Law and Rules §4509, which requires that library records containing personally identifying information be kept confidential except as permitted by law or with the user’s consent.

2. What Information We Collect and Why

We collect information in limited ways and only to support library operations and services. We make reasonable efforts to collect the minimum amount of information necessary.

Information may be collected:

1. Directly from you
2. Automatically through technology
3. Through voluntary interactions with third-party services

2.1 Information You Provide Voluntarily

Depending on how you use Library services, you may choose to provide:

1. Name, address, email address, phone number, driver's license number or other ID
2. Library card number or account credentials
3. Communications you send to JA

You may review or update certain personal information when feasible. If key information is removed, some services may no longer be available.

2.2 Library Records and Use Information

Library records may include information related to:

1. Circulation of physical and digital materials
2. Database and electronic resource access
3. Interlibrary loan requests
4. Computer or Wi-Fi use

Consistent with New York law, these records are treated as confidential. Transactional records are retained only as long as necessary for operational, legal, or accounting purposes and then deleted or anonymized when feasible.

2.3 Information Collected Automatically

When you visit Library websites or use online services, certain information may be collected automatically, such as:

1. IP address
2. Browser type
3. Device information
4. Date and time of access
5. Pages visited

This information is used in aggregate to maintain system security, diagnose technical issues, and improve services. It is not used to track individual use, including but not limited to reading or research behavior.

3. Cookies and Similar Technologies

Library websites may use cookies or similar technologies to:

1. Maintain session continuity
2. Remember user preferences
3. Produce aggregate usage statistics

You may disable cookies through your browser settings, though some services may not function properly as a result.

4. How We Use Information

Information collected by MVLS, SALS and JA may be used to:

1. Provide and manage Library services
2. Communicate about services
3. Improve Library operations and user experience
4. Meet legal, financial, or auditing requirements
5. Protect Library resources and systems

We do not sell patron information.

5. When Information May Be Shared

We do not disclose personally identifiable information except:

1. With your consent
2. As necessary to operate Library services
3. To trusted service providers acting on our behalf under confidentiality obligations
4. When required by law, subpoena, court order, or other legal process

When legally required to respond to a request for records, JA will seek to limit disclosure to the extent permitted by law and may notify the affected individual when allowed.

We do not disclose personally identifiable information except in the following circumstances:

1. With your consent
2. As necessary to operate Library services
3. To trusted service providers acting on our behalf under confidentiality obligations
4. When required by law, such as in response to a valid subpoena, warrant, court order, or other legal process. In such cases:
5. We will disclose information only after careful review and a determination that the request is valid and that applicable law, including New York State privacy protections for library records under CPLR Section 4509, requires compliance.
6. We will limit disclosure to the extent permitted by law.
7. When permitted, we will make reasonable efforts to notify the affected individual prior to disclosure. However, notification may not occur if we are prohibited from doing so by law or if we are unable to contact the individual.
8. When responding to records requests, JA will seek to minimize disclosure to the fullest extent permitted by law.

9. When JA is the complainant
10. In exigent circumstances, such as a life-and-death emergency or risk of serious physical injury

6. Third-Party Services and Resources

JA services may include links to or integrations with third-party vendors (such as databases, digital content providers, analytics tools, and communication platforms). These providers operate under their own privacy policies, and patrons are encouraged to review them. JA is not responsible for the privacy practices of third parties.

A current list of third-party service providers used by JA, including links to their respective privacy policies and descriptions of their services, is maintained in a separate document available at:

[Link to Third-Party Vendors and Services List doc](#)

6.1 Website Analytics

JA uses website analytics tools to collect limited, aggregate information about use of its online services. This may include general information such as IP address, browser type, pages visited, date and time of access, and site performance data.

This information is:

- Collected in aggregate form
- Used solely to improve services
- Not linked to individual patron records
- Not used to personally identify users

Additional information about the specific analytics providers used, including opt-out options, is available in the Third-Party Vendors and Services List.

6.2 Text Messaging

For patrons who opt in, MVLS, SALS, and JA may provide notifications via text messaging services. These messages may include account-related notices such as holds, overdue items, fines, and other general alerts.

- Message frequency may vary
- Message and data rates may apply
- Users may opt out at any time

Instructions for managing text message preferences, including opt-out methods and service provider details, are available in the Third-Party Vendors and Services List or by contacting a participating member library.

Personal information provided for messaging services will not be sold or shared with third parties for marketing purposes.

7. Data Security and Retention

We use reasonable administrative, technical, and physical safeguards to protect collected information. Information is retained only as long as necessary for legitimate Library purposes or as required by law, after which it is securely deleted, anonymized, or archived.

In the event of a data breach or unauthorized disclosure affecting personal information, JA will respond in accordance with applicable law and incident response procedures will be initiated to identify the suspected breach, remediate the breach, and notify appropriate parties.

8. Changes to This Policy

This Privacy Policy may be updated periodically. Changes will be posted on our website with an updated "Date Revised" date. Material changes may also be communicated through additional means.

9. Contact Information

Questions or concerns about this Privacy Policy or the data we manage may be directed to:

Joint Automation Project
Mohawk Valley and Southern Adirondack Library Systems
22 Whitney Place, Saratoga Springs, NY 12866
Email: computersupport@sals.edu
Phone: 518-584-7300, option 1