



# 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 information is 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 by JA to identify or track individual patron's use of library materials or services, including 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 personal information or disclose personally identifiable information to third parties for commercial marketing or targeted advertising purposes.

We may use third-party service providers to support JA operations, including website analytics and system functionality. These providers may collect limited technical or usage information on our behalf (such as IP address, browser type, and pages visited) to help us maintain, evaluate, and improve JA services. Such information is used for operational and analytical purposes and is not used by the JA to identify individual patrons or to support commercial advertising.

## 5. When Information May Be Shared

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 contractual or confidentiality obligations for operational purposes
4. When required by law, such as in response to a valid subpoena, warrant, court order, or other legal process
5. In exigent circumstances, such as a life-and-death emergency or risk of serious physical injury
6. When JA is the complainant in a legal matter

When responding to legal requests, JA will review each request carefully, disclose only the information required by law, and seek to limit disclosure to the fullest extent permitted. When permitted, JA will make reasonable efforts to notify the affected individual prior to disclosure. Notification may not occur if we are prohibited from doing so by law or if we are unable to contact the individual.

## 6. Third-Party Services and Resources

JA services may include links to or integrations with third-party vendors (e.g., databases, digital lending platforms, analytics, messaging services, etc.). These providers operate under their own privacy policies, and patrons are encouraged to review them. JA is not responsible for third-party privacy practices.

### 6.1 Website Analytics

We use Google Analytics to collect limited, aggregate data about website usage in order to improve our online services. The information collected may include IP address, browser type, pages visited, date and time of use, and site errors. This data is used only in summary form, is not linked to patron records, and is not used to identify individual users.

Google Analytics may place cookies on your device to collect this information. More information about Google's privacy practices is available at <https://policies.google.com/technologies/partner-sites>. Users may opt out of Google Analytics tracking by using the Google Analytics Opt Out Browser Add On at <https://tools.google.com/dlpage/gaoptout>.

### 6.2 Text Messaging

For customers who opt in, MVLS/SALS and JA may send notices via text messaging services. Customers can expect to receive account notifications regarding holds, overdues, fines, and other general notices. Message frequency may vary. Message and data rates may apply. Customers may receive support by contacting any of our participating member libraries. Library staff will respond as able during regular business hours. Customers can opt out of receiving text notifications by texting STOP to cancel, logging into their library account at [search.sals.edu](http://search.sals.edu) and changing their notification option, or by reaching out to a participating member library. Personal information and mobile numbers collected through opt-in will not be shared, sold or rented 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 established 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](mailto:computersupport@sals.edu)  
Phone: 518-584-7300, option 1

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