



PRIVACY POLICY

1. The library has over 2,700 users who have received information about the data held regarding them, and the key reason - to enable them to use the library's services. The formal purposes are:
 - to enable them:
 - to use the services following their application for membership, eg the borrowing of books and/or DVDs,
 - to be informed via the emailed Newsletter of the closing/re-opening dates for Bank Holidays (and the pre-new year period),
 - to be informed via the emailed Newsletter of the events in the library available to them and the registration processes to enable them to reserve a place in the limited space of our library.
 - to enable the library:
 - to contact them in the case of overdue borrowings and other matters,
 - to be sure that DVDs with a recommended minimum age limit are not (save inadvertently) loaned to children below that age.
2. Members, volunteers and charity company members can check or update their personal data held by the library (eg if their postal or email address changes). Any enquiries should be emailed to mail@gardensubrlibrary.org.uk .
3. The 'data controller' is Garden Suburb Community Library Ltd ('the library'), company no.8155061 and registered as a charity with the Charity Commission, registration number 1149211 (<https://www.gov.uk/government/organisations/charity-commission>). Being a charity the library's directors are known as 'trustees' and the email address mail@gardensubrlibrary.org.uk comes to one of the trustees. Alternatively, an envelope addressed "To the library trustees" can be left for them at the library, 15 Market Place, London NW11 6LB
4. the purposes for which personal data are held (and therefore 'processed') for library users are set out in 1 above. Additionally, library volunteers and members of the charity company have received notification of the additional purposes applicable to them. As required by the regulations (General Data Protection Regulations ['GDPR']), the library's legal basis for the processing is in one or more of paragraphs (b), (c) &

(f) of Article 6.1 of the GDPR, or where consent happens to be given on a particular form, paragraph (a); these paragraphs can be summarised as:

- (a) consent; or
- (b) contractual performance; or
- (c) compliance with a legal obligation; or
- (f) that the processing is necessary for the legitimate interest of the data controller (the library company).

Where the processing is based on point (a) of Article 6(1), for example parental consent to a child's details for participation in a summer event (or whatever), the consent and participation can be withdrawn at any time up to the event taking place, by notification to mail@gardensuburblibrary.org.uk or by a note addressed to the event organiser left at the library. Under the regulations, this does not affect the lawfulness of processing before the consent's withdrawal.

Where the processing is based on point (f) of Article 6(1), the legitimate interests applicable to volunteers, and the legal obligation applicable to the charity company members, have been made known to them respectively. For library users, known as members, the legitimate interests arise because the library delivers its services to users through the processing of their data, and therefore has to hold their details for the purposes outlined in 1 above.

5. While the Newsletter is an integral part of the membership services, as indicated in 1 above, and therefore the library does not require members' consents to issue it to them, members can always choose to 'unsubscribe' at the foot of any issue received.
6. Data are stored while a person remains in one of the above categories, and thereafter for 12 months or such longer period, if any, as may seem necessary for the library's performance of its legal obligations. The library is not always informed when a user decides to end their interest in the library, in which case the data remain. Data might also be retained if items or money were outstanding.
7. In order to provide visitors to the library's website with as good an online experience as the software permits, the website uses cookies.
8. Confidentiality of personal data has been a requirement since the Community library was established. The library rule is not to disclose personal information about library users without their consent (or a statutory authority certified by the board).
9. If members, volunteers or the charity company members have a concern regarding processing of their personal data, please in the first instance email to mail@gardensuburblibrary.org.uk. If the library is unable to satisfy the concern, the regulations provide a right to lodge a complaint regarding unlawful data processing or breach of one of the above provisions with the supervisory authority, Information Commissioner's Office, Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF. Tel: 0303 123 1113 (local rate) or 01625 545 745.

(updated 25 May 2018)