

Processing and protection of users' personal data

I. Processing of personal data

The Education and Research Library of the Pilsen Region (hereinafter ERLPR), an allowance organisation, is the **administrator** of the personal data of its registered users, as well as that of non-registered users and visitors. The ERLPR processes personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of physical persons in connection with the processing of personal data and the free movement of such data and the abolition of guideline 95/46/ES (general ruling on the protection of personal data).

The purpose of processing personal data is the administration of services provided and the records of registered and non-registered users associated therewith, as well as records of participants in educational courses, seminars, excursions, cultural events etc., organised by the ERLPR.

The ERLPR processes basic and other personal data of the afore-mentioned subjects, statistical data, service data, accounting data and legal data. Such data is processed for the following reasons:

- a) providing users with relevant information on the basis of an agreement – registration
- b) protection of library stock and other items owned by the ERLPR
- c) preventing misuse of the Internet for criminal activity
- d) statistical evaluation of the ERLPR's activities
- e) recording income and collection of money owed
- f) procedures in dealing with user requests
- g) information about services provided by the ERLPR
- h) participation in educational and cultural events

Personal data is processed by ERLPR staff both manually and electronically. The ERLPR processes only genuine and precise personal data, which it verifies for the purpose. Personal data is processed only to the extent necessary and for a time period which is essential for the purpose for which the data was provided.

The ERLPR processes personal data of **registered users** to the following **extent**:

1. **Basic data** of a registered user consists in his/her:

- a) name and surname
- b) permanent address; in the case of foreigners, their address in the CR
- c) date of birth
- d) type and number of personal ID
- e) country in which the document was issued, if other than the CR
- f) holder of a ZTP/P card or confirmation from an optician for the registration of a visually impaired user of the ary for the visually impaired

2. **Additional data** which an applicant for registration is not obliged to provide (optional data) includes:

- a) user's contact address for the forwarding of information if this address differs from the permanent address
- b) telephone number
- c) e-mail address
- d) academic title
- e) data for setting the level of the registration fee (student, senior citizen, holder of TP or ZTP cards)

The applicant is obliged to provide the basic data and agree to its processing. S/he is not obliged to provide additional data.

The ERLPR verifies the basic data according to the user's valid personal documents on the occasion of the user's initial registration, then in the event of any change in this data and renewal of registration. In order to protect library stock and proper use thereof, the library takes care to ensure there are no cases of multiple registrations by a single user.

Therefore, in order to prevent such an occurrence, prior to the registration of a user, library staff will run a check in the database of registered users. Data in the sense of item 1 f) above should be provided by a user wishing to use the advantages provided by the ERLPR to visually impaired users.

A registered user is obliged to announce personally any change of name, surname or address without undue delay.

Data in the sense of item 2 a) to c) above are provided if the user wishes to enable the ERLPR to use such data in communications concerning library information, e.g. an order, reservation or sending reminders. Data in the sense of item 2 f) above should be provided by a user wishing to claim a reduction in the registration fee.

3. **Service data** refers to data concerning transactions carried out in a reader's account, including the date and time of the transaction and user name (login) of the library employee concerned. Administrative data consists especially in the following:

- a) registration and library card
- b) the subject, place and time of the issue and termination of a circulating loan or recorded onsite loan of an item not in free selection
- c) order of a library item
- d) reservation of a library item
- e) loan via the inter-library loan system
- f) payment for damage caused to a loaned item
- g) reminders sent

4. **Accounting data** refers to data concerning outstanding debts and financial transactions between the user and the ERLPR, including especially purpose, place, time, user name of the library employee concerned and other details.

5. **Legal data** refers to data concerning legal measures taken by the ERLPR against a user who is delaying making necessary payments or has in some way caused harm to the ERLPR. Such data concerns especially when and to which public

authority a request was addressed regarding protection of the legal rights of the ERLPR and the response of that authority. Legal data also includes papers from the user containing requests addressed to the library.

II. Storing personal data

Personal data of users of the ERLPR is stored:

1. In original documents, which are:

- a) user's registration form
- b) accounting and legal documents
- c) documents submitted by the user, relevant to the application

Written documents are stored in locked boxes or drawers in the administrative section of the library to which users and other unauthorised persons do not have access. Access to these written documents is available only to library staff within the parameters of their job description. Disposal of accounting documents and correspondence is conducted in accordance with law 563/1991 on accountancy, and law 499/2004 on archives and documents and on certain laws as amended, and in accordance with the Document and Shredding regulations of the ERLPR.

2. In a computer database, the security of which is ensured on several levels:

a) Physical protection

Users' personal data is recorded in electronic databases on a server located in a separate locked room. Works computers allowing access to personal data are located in specified places (offices or other designated work spaces) to which users and unauthorised persons do not have access.

b) Software protection

Access to library computer programmes (catalogues), in which personal data is processed, is secured by a password. The possibility of working with personal data is thus limited solely to library staff who are working with the loan module. Personal data is stored in a database, access to which is password protected. Back-up copies of data are regularly put on data carriers and preserve the state of the database up to a certain data. Data on external data carriers is encoded.

c) documents submitted by the user, relevant to the application

Library staff and employees of external companies who have access to the computer network for reasons of hardware and software maintenance are informed of their responsibilities when dealing with personal data of ERLPR users and are committed to confidentiality as regards such data. Employees of the ERLPR are obliged to process personal data strictly within the parameters of their job description and tasks assigned to them by their supervisors for the purpose and to the extent specified and in accordance with the relevant internal guidelines and regulations. ERLPR employees are amongst other things obliged to attend to the accuracy of processed data and verify the same according to relevant documents. They are further obliged to eschew any procedure which could be interpreted as unwarranted publication of users' personal data or such procedure which might result in a third party gaining unauthorized access to personal data of users of the ERLPR.

3. **In archival media**, which preserve the state of databases described in point 2 b) above, always up to a given date on standard media used for archival purposes.

It is not possible to remove users' personal data in archival media by deletion as in the case of a computer database on the server. Therefore access to archival media is limited solely to authorized staff.

Each renewal of data from archival media requires written protocol. For renewal of data from archival media stored more than 30 days before its usage, it is necessary to obtain written permission from the director of the ERLPR.

III. Period for processing personal data and its disposal

1. The library processes users' personal data to the above-mentioned extent from the moment the user submits a completed registration form to the library, then during the period of the contractual agreement plus 24 months, with the exception of personal data stored in archival media.
2. Personal data of a registered user recorded **in paper form** is disposed of by the ERLPR by shredding the relevant papers. Shredding is governed by Law 499/2004 on Archives and Records and changes to certain laws as amended, the Records and Shredding regulations of the ERLPR and further legal regulations.
3. Personal data of a registered user recorded **in computer databases** is disposed of by deletion of basic and other (non-compulsory) data.
4. Personal data recorded in archival media is disposed of no later than six months after the initial entry.
5. Personal data of a registered user who has no outstanding obligations towards the library is disposed of no later than 24 months after expiry of the last valid registration. Should the user still have obligations towards the library (unreturned items, unpaid fees), the contractual terms are not terminated and the personal data of such a user remains on file in the library system for such time until the obligations have been resolved and following such resolution are disposed of within a maximum period of two years.
6. In disposing of accounting data the ERLPR acts in accordance with Law 563/1991 on accounting.
7. Personal data of users which is recorded in paper form is removed from the registry after the expiry of a valid registration or completion of a procedure and disposed of in accordance with the Records and Shredding regulations of the ERLPR.
8. A user who is not in debt to the ERLPR may request the partial removal of certain personal data from the records without his/her registration being terminated. Such partial removal includes data concerning circulating and onsite loans, reservations and orders. Records less than three months old from the termination of a loan cannot be removed. In the case of such partial removal, the user renounces any rights to complaints arising from the partial removed data.
9. A request for complete or partial removal of personal data should be submitted by the user in writing. The application is handled after necessary verification of the user's identity within one month from the date of delivery. In case of need and with

a view to the complex nature or number of applications, this period may be extended by a further two months. The applicant will be informed of such an extension within one month of receipt of the application, together with an explanation for the delay. This is on condition that the contractual relation between user and library has been terminated and the user has no debts towards the ERLPR.

The ERLPR provides personal data to third persons only in the event of such a request from users in relation to their own data or if a legal regulation requires it or to protect the rights of the ERLPR in the case of a debtor.

IV. Rights of users regarding the protection of personal data

- a) Right of users to access personal data
- b) Right of users to correct personal data
- c) Right of users to the deletion of personal data (be forgotten)
- d) Right of users to the restriction of processing of personal data
- e) Right to the transferability of personal data
- f) Right to raise an objection
- g) Right to lodge a complaint with the supervisory body (Office for the Protection of Personal Data)

The user is informed of above-mentioned rights in the Library Regulations and on the library web page at <https://svkpk.cz/?p=9432&preview=true>. The user has the right to obtain confirmation from the ERLPR stating whether or not the user's personal data is being processed and, if it is, the right to obtain access to such personal data.

The ERLPR enables the user to view the user registration form and other documents saved by the library. The ERLPR also allows access to certain personal data by means of the reader account.

The ERLPR will provide the user upon request with a copy of personal data being processed. If further copies are required, or in the event of clearly unjustified or excessively repeated requests being made, the ERLPR reserves the right to impose an administration fee. If the user submits a request in electronic form, wherever possible information will also be provided in electronic form by standard means unless the user requests otherwise.

The user may also request a copy of personal data in a structured, commonly used and machine-readable form (right to transferable data). Such a request should be submitted in writing.

A user who ascertains or suspects that the ERLPR is processing his/her personal data in contravention of the protection of private and personal life may request an explanation from the ERLPR and an end to the situation which has arisen (especially by means of correction, addition, restriction of processing or disposal of personal data). If the request of the user is upheld, the ERLPR shall rectify the unsatisfactory situation without delay and in a manner appropriate to the given case.

The user has the right to contact the ERLPR at any time concerning matters of personal data or to submit a complaint to the supervisory body (Office for the Protection of Personal Data).

Applications and complaints are handled by the ERLPR after necessary verification of the user's identity within one month from the date of delivery. In case of need and with a view to the complex nature or number of applications, this period may be extended by a further two months. The applicant will be informed of such an extension within one month of receipt of the application, together with an explanation for the delay.

Contact details of customer service staff authorised to provide information about processing of personal data (gdpr@svkpk.cz) appears in all sections of the library and on the library web page: <https://svkpk.cz/o-knihovne/struktura-oddeleni-knihoven/>.

V. Period for processing personal data and its disposal

The administrator of the camera system is the ERLPR.

For reasons of protection of property and safety of persons, the entrance and selected areas of the main building of the ERLPR are monitored by a camera system. Entrances to areas monitored by the camera system are clearly marked by pictogram. When entering the library users accept that their movements may be monitored.