

# LIBDATA PRIVACY SHIELD PRIVACY POLICY

EFFECTIVE DATE -- **JANUARY 1, 2020**

This notice was updated on December 19, 2019

## LIBDATA PRIVACY SHIELD PRIVACY POLICY

LIBDATA has created this Privacy Shield Privacy Policy to help you learn about how we comply with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework, as set forth by the U.S. Department of Commerce, regarding the collection, use and retention of Personal Information that is collected by our customers located in the European Economic Area (the “EEA”), UK, and Switzerland and transferred to LIBDATA in the U.S.

Libdata has subscribed to the Privacy Shield program, which covers both the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks, and, therefore, LIBDATA has certified that it adheres to the EU-U.S. Privacy Shield Principles and the Swiss-U.S. Privacy Shield Principles, both of which include Supplemental Principles (collectively, the “EU-U.S. and Swiss-U.S. Privacy Shield Principles”) for Personal Information covered by the Policy. More information about the EU-U.S. Privacy Shield and the Swiss-U.S. Privacy Shield, including the list of certified organizations, can be found at <https://www.privacyshield.gov>. This Policy applies to LIBDATA. If there is any conflict between the terms in this Policy and the EU-U.S. and Swiss-U.S. Privacy Shield Principles, the EU-U.S. and Swiss-U.S. Privacy Shield Principles will govern.

Personal Information consists of SIP2 data obtained when a library patron logs into a computer. It may contain the user’s first/last name, address, DOB, library membership number. This information is not transferred to Libdata, but, is viewable by Libdata’s support personal during support sessions. It is only accessible when the customer allows Libdata access to the information (via connection to the server). The information is not collected or stored – only the last patron to login is displayed, so support personnel will only be able to view a single patron’s information at a time.

## DISCLOSURES TO AFFILIATES AND THIRD PARTIES

Your user's personal Information is not collected or transferred to Libdata – so it will never be disclosed to third parties:

## **DATA SECURITY**

We use reasonable physical, electronic, and administrative safeguards to protect your Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the nature of the Personal Information and the risks involved in the processing that information.

## **DATA INTEGRITY AND PURPOSE LIMITATION**

We limit the viewing of this data to Libdata support personal only, it will not be collected or stored at Libdata.

## **ACCESS TO PERSONAL DATA**

You can ask to discuss any personal data that was viewed by support personal by sending a written request to [support@libdata.com](mailto:support@libdata.com).

## **ENFORCEMENT AND DISPUTE RESOLUTION**

If you have any questions or concerns, please write to us at the address listed below. We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Information in accordance with the EU-U.S., and Swiss-U.S. Privacy Shield Principles.

In the event we are unable to resolve your complaints or disputes, you may contact JAMS (<https://www.jamsadr.com/eu-us-privacy-shield>), an alternative dispute resolution provider located in the United States, for more information or to file a complaint. JAMS will investigate and assist you free of charge in resolving your complaint.

As further explained in the EU-U.S., and Swiss-U.S. Privacy Shield Principles, a binding arbitration option will also be made available to you in order to address residual complaints not resolved by any other means. Libdata is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.

## **DISCLOSURES REQUIRED BY LAW**

We may need to disclose Personal Information in response to lawful requests by public authorities for law enforcement or national security reasons or when such action is necessary to comply with a judicial proceeding or court order, or when otherwise required by law.

## **CONTACT INFORMATION**

If you have any questions regarding this Privacy Shield Privacy Policy, please contact us by email at [support@libdata.com](mailto:support@libdata.com), or please write to the following address:

Legal/Privacy Department  
Libdata  
1171 Terrace Acres Dr, Auburn, AL 36830

## **PRIVACY POLICY CHANGES**

This policy may be changed from time to time, consistent with the requirements of the Privacy Shield program. You can determine when this Policy was last revised by referring to the "LAST UPDATED" legend at the top of this page. Any changes to our Policy will become effective upon our posting of the revised Policy on the Site.