

APPENDIX III: PERSONAL DATA PROTECTION FOR LIBRARY PATRONS – INFORMATION MEMORANDUM

The document you are currently reading contains basic information about how we process your personal data. We appreciate that you shared your personal data with us and we are committed to protecting them to the maximum possible extent. We will also take efforts to be as transparent as possible in relation to you, in particular as regards the way we process your personal data.

This information memorandum has been prepared in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR).

When processing personal data, the National Library of Technology (hereinafter only the "NTK") proceeds in accordance with legislation, the Conditions of Use of the Integrated Library (hereinafter only the "Conditions of Use"), the VPL Conditions of Use (Czech only) and other generally binding regulations. The personal data are processed by NTK staff both manually and in an automated manner. The NTK processes only true and accurate personal data, which it verifies for this purpose.

1. Purpose of Patron Personal Data Processing

1.1 Protection of assets acquired using public budget resources, in particular NTK, UCT Prague and IOCB Prague collection intended for off-site lending outside the NTK building,

1.2 Provision of quality services to Patrons – enabling NTK to effectively contact the Patron in cases determined in the Conditions of Use or in cases when the Patron so requests; to keep accurate records of all transactions implemented in relation to the Patron, in particular about loans, lent subjects, start and end through the use of registering system tools by the library staff implementing such transactions; to perform checks of the quality of provided services and thorough checks of the causes of complaints from Patrons; to perform statistical evaluations of its activities, in particular lending activities, and their evaluation for the effective acquisition and management of the library collection, provision of information about the services provided by NTK,

1.3 Performance on obligations imposed on NTK through generally binding legislation.

2. Processed Personal Data

2.2 NTK processes personal data of a registered Patron or their representative based on a service provision contract and in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.

2.3 The NTK processes basic and other personal data, statistical data, service data, accounting data, and legal data. These data are processed for the following purposes:

- provision of services to the NTK Patrons;
- protection of NTK and library collection assets;
- evaluation of user satisfaction and checks on the quality of work performed by the NTK staff;
- statistical evaluation of the activity of NTK;
- recording of receivables and accounting operations;
- procedure for settling NTK Patron requests;
- provision of information about services provided by NTK.

NTK processes the personal data of minor Patrons and also the personal data of their legal guardians (in the same structure).

Basic Patron Identification Data:

- first name and last name;
- patron ID, date of registration and validity, patron category;
- day, month, year, and place of birth;
- permanent or temporary residence or other address where the customer resides in the Czech Republic (street, number, municipality, postcode);
- document number, document type, date of issue and issuer;
- card number, affiliation to a course of study or organization;
- nationality and residency in the Czech Republic.

An applicant for registration shall present such data and tolerate their processing if they wish to use the full services of the integrated Library. A Patron who does not consent to the processing of basic identification data may only use the free services of the integrated Library, e.g. on-site studies in the library Open Stacks, Reprographic Services etc.

The basic identification data are verified by NTK based on the valid personal documents issued by state administration bodies and local government bodies to prove Patron's identity, in accordance with which it is possible to verify all the basic information. For citizens of the Czech Republic, such document is as a rule their identity card. The NTK verifies the basic identification data of a Patron upon registration, at every renewal of a Patron Card, and at every change to any of the indicated data. In the interest of protection and effective use of the library collection, NTK checks to ensure that the same Patron is not registered multiple times, and hence before every registration of a new Patron the relevant NTK staff member checks for any record duplicity in the integrated Library Patron Database.

Other Patron Contact Data (if the Patron is willing to provide them):

- academic title;
- correspondence address (street, number, municipality, postcode);

- telephone, email address;
- other data needed to receive a discounted registration price (disabled, unemployed person).

Service data are data about transactions with a patron account, including the place and time of the transaction and the name of the librarian. Service data include, in particular:

- data about issued and cancelled Patron Cards;
- data about Patron offences and bans that influence the conditions of renewal or revocation of NTK Patron Cards;
- personal notes on the registration of the Patron;
- Patron logins to the computer network via the public electronic catalog, the internet;
- compensation of damage to a borrowed Library Item.

Accounting data are data about financial transactions, in particular their purpose, place, time, and other requisites.

Legal data are data about legal actions taken by NTK against a Patron (or their representative) who is in default with the repayment of a late fee. In particular, these are data regarding when and to which public authority a petition aimed at protecting the rights of NTK was addressed, and which authority decided on such petition. Legal data also include the data indicated in the documents through which the Patron demonstrates the facts stated in an application.

A Patron who discovers or believes that NTK is processing their personal data in violation with the protection of their private and personal life, may request NTK for an explanation and rectification of such situation (in particular through correcting, supplementing, limiting processing of, or deletion of, the personal data). If the Patron's request is found to be justified, NTK will rectify the situation without delay in a manner in accordance with the nature of the case. Such a request must be submitted in writing at the library.

3. Retention of Personal Data

On original documents:

Contract for the Use of Integrated Library Services

This document is stored in the NTK archive for the validity period of the Patron Card, while at the renewal of the card or a change to any personal data, a new contract is concluded and the original is shredded.

For registered authorized persons from the UCT Prague, IOCB Prague, CTU and CZU, the first signed Contract for the Use of Integrated Library Services is stored (in the event of a change to any personal data, a new contract is concluded and the original is shredded). No new contract is concluded at the automatic renewal of registration if there is no change to personal data.

Access to such documents is possible only by the NTK staff members who work with the documents as part of their jobs.

In a computer database:

Library Patrons Registration Database

This records the basic identification data of a Patron, other contact data of a Patron, and service data. The database is stored on a dedicated NTK server, and access to this database is protected through a system of access accounts, passwords and rights set as necessary to allow NTK staff to perform their jobs. The data stored in the Library Patrons Registration Database have antivirus protection and a system of backups stored outside the NTK building.

On archival media:

The database state is always stored on specified dates on DLT tapes.

4. NTK Staff Obligations when Processing Personal Data of an Library Patron

All NTK staff must process personal data exclusively in accordance with their job description and the tasks imposed on them by their managers, within the scope and purpose described above, and in accordance with legislation, applicable internal directives, and other binding regulation.

NTK Staff shall:

- take efforts to ensure accuracy of the processed personal data and verify them in accordance with the documents designated for this purpose;
- refrain from any conduct that could lead to unauthorized access to the personal data of an Library Patron by a third party;
- immediately report to their superior any complaint submitted by a Patron in connection with the protection of their personal data, whether orally or in writing;
- maintain confidentiality regarding personal data and security measures, even after termination of their employment at NTK.

NTK Staff May Not:

- share their access passwords to the NTK network with anybody;
- share information about security measures employed to protect the collections with unauthorized persons;
- permit presence of unauthorized persons in an area where personal data are processed and stored;
- communicate personal data out loud in the public areas of the NTK building, unless the data subject explicitly requests;
- permit unauthorized persons to view documents and computer screens showing the personal data of other Patrons;
- share information about other Patrons.

A violation of these obligations by an NTK staff member may be considered a serious violation of obligations arising from legislation relating to the work performed by such person, and resolved pursuant to Section 52 of Act No. 262/2006 Coll., Labor Code, as

amended, and Directive No. 2/2018 of the NTK director on protection and processing of personal data at NTK.

5. Personal Data Deletion

The NTK begins to process the Patron's personal data when the Patron signs the Contract for Use of Integrated Library Services with NTK, giving their consent to the processing of their personal data.

The NTK retains Patron's personal data until such Patron requests their deletion in writing, or until the Patron Card validity expires after two years, or for two years from the settlement of the last Patron obligation towards the Library, depending on which condition is fulfilled the last.

If a Patron requests termination of their personal data processing or the above deadline expires, and the Patron has no outstanding obligations towards the Library, NTK will consider the contractual relationship to be ended, and will delete the personal data:

- by shredding the original documents; the Contract for Use of Integrated Library Services is physically destroyed in accordance with the NTK Shredding Rules. Such shredding is governed by Act No. 499/2004 Coll., on Archiving and Records Management and on the amendment to other laws, as amended, and other legislation;
- by deleting the data in the Library Patrons Registration Database, while any personal data in other systems are anonymized. These anonymized data will only be used for statistical purposes.

Archive and backup copies that contain personal data about a Patron are accessible only to a limited number of NTK staff, who have been authorized by a written decision of the NTK director. The restoration of data from archival and backup copies is only possible based on a written order from the NTK director, and a written report must be drawn up about every data restoration. After the restoration of data from archive and backup copies, the data of all Patrons meeting the conditions stated above will be deleted.

If NTK violates obligations determined through Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("GDPR") it establishes NTK's liability for any damage that is thereby incurred by a third party. If a Patron discovers that there has been a violation of obligation by NTK, they have the right to request NTK for immediate redress, or to contact the Office for the Protection of Personal Data with a request for remediation measures.

In Prague, dated May 31, 2023
NTK director
Ing. **Martin Svoboda** m. p.