

**BAY COUNTY LIBRARY SYSTEM  
CONFIDENTIALITY POLICY  
DISCLOSURE OF PATRON REGISTRATION INFORMATION**

It is the policy of the Bay County Library System to preserve the confidentiality of the registrations of its patrons to the fullest extent permitted by law. To that end, the registration records of the library shall be released or disclosed only as provided herein.

All patron registration information shall be treated by the staff of the Bay County Library System as confidential, including name, address, phone number, and any other information provided on the patron's information form. This policy also prohibits disclosure of whether or not a person has a library card.

1. **Registration Records** – This policy defines “registration records” as any information gathered from the patron on the library card registration form (name, address, phone number, etc.). This policy does not cover circulation records protected by the Michigan Library Privacy Act. For information on non-disclosure of those records, see the Bay County Library System Privacy Policy.
2. **Notification of the Library Director** – Any employee of the Bay County Library System who receives a request, or who is served with a subpoena, court order, or other legal process, to release or disclose any registration record shall promptly notify the Library Director, or designee.
3. **Action by the Library Director** – The Library Director, or designee, shall, in a timely manner, review all requests and orders, consult with the library's attorney, as necessary, and respond in an appropriate manner to each request or court order in accordance with this policy and with the Michigan Freedom of Information Act, 1976 Public Act 442, MCL 15.231-15.246.
4. **Requests for Registration Information** – The Library Director, or designee, shall deny, in writing, all requests for the release or disclosure of registration information unless the Library Director, or designee, has received the written consent to such release or disclosure from the person(s) identified in the records. Patron registration information is considered by the library board to be “information of a personal nature where the public disclosure of the information would constitute a clearly unwarranted invasion of an individual's privacy” as exempted from disclosure in the Michigan Freedom of Information Act, MCL 15.243 (1).
5. **Freedom of Information Act Requests for Registration Information** – The Library Director, or designee, shall deny, in writing, any designated “Freedom of Information Act” request for the release or disclosure of confidential patron registration information.

03/24/10 board approved