

Personal Data Formats (Pergamon & Mystic)

Document Details

Description

This document describes the full extent of the <u>Personal Data</u> stored within the database format utilised by the Pergamon MU and Hybrid desktop applications, as well as the online cloud-based Mystic application.

It is discussed and justified only in its naming, and not with the inclusion of database-schema descriptions such as data type, size, indexing etc.

As bibliographic data is essentially in the public domain, and meta-data used to support the operation of the Pergamon and Mystic applications are not considered to be personal data and therefore not covered by the GDPR EU or UK GDPR, they are not covered by this document.

Note that some data elements discussed within this document are listed only because of their [arguable] potential to be regarded as personal information if <u>linked</u> with other information stored elsewhere, or through the use of personal knowledge of individuals by client staff members within the confines of the environment where Esferico ltd. applications are in use.

Definitions

Within this document, two different sets of personal data are discussed, each with their own range of data fields being stored. These personal data sets, utilising Pergamon / Mystic terminology are regarded as:

- Staff User employee tasked with administering the library environment.
- Reader public user of the library, a student, employee of a company library etc.

In both cases, data fields discussed are regarded as *personal data* but the individual data fields recorded may vary, or overlap due to the existence of the individual as both a staff user and a reader within the database.

History

Effective date of this document: 1st October 2021

Document Owner: Esferico ltd.

Version	Date	Description	Author
1.0	2018-02-14	Initial author	ESF-CR
1.1	2021-10-01	Re-Enabling of client control of the	ESF-CR

	Expanse indexing system.	

Externally Sourced Personal Data - Reader

Data stored within the Pergamon family of applications utilises the following reader data sourced either electronically or through manual data entry from other data sources:

- Alternate HID (optional)
- Last Name (required)
- First Name (required)
- Known As (optional)
- Date of Birth (optional)
- Reader Group (optional)
- Gender (optional)
- Photograph (optional)

The only required externally sourced personal data remains the <u>Last Name</u> and <u>First Name</u>, in order to allow ease-of-use identification of readers using the library environment, and requesting to borrow items. The Pergamon systems do not regard the last and first name, or combination thereof into formal or informal formatting to be unique in nature, or absolutely unique identifiers of an individual. Even when combined with group, date of birth and gender they do not represent absolutely guarantees of uniqueness. However improbable, it is possible for a reader to share all of these data values.

The <u>Alternate HID</u> (Human readable ID) is a unique value representative of the reader in an external central database (e.g. a school administration system in an education environment). Use of the Alternate HID is optional and is included to allow unique matching of a reader in the Pergamon database with update data provided by the central system at a later date for currency updates (e.g. movement of a student to a new tutor group in subsequent academic years).

The <u>Known As</u> field is an optional field provided to allow alternate name identification under a variety of possible scenarios ranging from respected personal preference to certain Child Protection situations.

<u>Date of Birth</u> is an optional field, but often used for providing statistical information to prove fair and equal the use of the library by age groups.

<u>Reader Group</u> is an optional field, but generally accepted to be a vital field allowing readers to be processed in groups (especially in library environments, correspondence and attendance within the library is administered via tutor group / class).

<u>Gender</u> is an optional field, but often used for providing statistical information to prove fair and equal use of the library by gender. This field is deliberately non-binary in order to provide alternatives to the binary M/F choices as well as accommodating non-human readers (e.g. a collective class group or projects).

The <u>photograph</u> of the reader can be attached to the reader record for identification of the reader in some situations. Attachment of the reader image is optional, and only required

under some situations – it is more likely to be used in circumstances with large numbers of readers, or where public access to the library is possible.

Native Personal Data - Reader

In addition to personal data provided from external sources, a limited number of additional data fields are populated only within the Pergamon family of applications. Their status as personal data which can identify an individual is therefore arguable but they are included here for completeness and full disclosure:

- HID (required)
- Date Start (optional)
- Date End (optional)
- Password (required, when used)
- Circulations History

The <u>HID</u> (Human readable ID) is the unique human-readable reader identification method within the database structure. It is the prime method which is used functionally for all reader operations and is often known to end-users as simply 'the reader barcode'.

In isolation, the HID cannot be used to identify individuals, and is usually used by end-users in conjunction with the First and Last names of the reader.

The <u>Date Start</u> field is an optional field recording the date on which the reader started availability within the library. It is typically used in calculating permissions to borrow items and logically should match the date started within the wider environment (e.g. the school). As long as this field contains a date prior to the current to allow circulations however, the field can remain an optional date entry.

Typically, when set within an educational environment, the Date Start field is the same for all readers within the same year group.

The <u>Date End</u> field is an optional field recording the date on which the reader will end availability within the library. It is typically used in calculating permissions to borrow items and logically should match the date on which the reader will leave the environment (e.g. the school) in order to prevent circulation of items which they cannot return. While this field needs only to be a date in excess of the current date plus loan duration, this limits the functional use of the application's circulations system.

Typically, when set within an educational environment, the Date End field is the same for all readers within the same year group.

The <u>Password</u> field is a required field, only where the client organisation permits access to the application to readers for the purposes of viewing their historic data, accessing their stored information (a GDPR compliant profile page is provided for free access to stored data), or performing some basic self-service operations).

The <u>Circulations History</u> attaches the reader record to the issue and use of items from the library. It is generated automatically by the *functional operations of the application*, and is listed here for full disclosure due to the generation of a personal activity record.

Additional, Non-Personal Data - Reader

The following additional fields are stored within most reader records, but which are of a nature which is not regarded as personal information, is generic, or data which is typically attached to large groups of readers and therefore cannot be used to identify individuals:

- Age Range (optional)
- Circulation Profile (Required)
- OPAC (Required)
- MysticAIR License (optional)

The <u>Age Range</u> field is selected from a range of locally allocated values which may, or may not, have a direct relationship to the age of the reader. Typically, the Age Range field is used to restrict access to certain types of item in the library. The field tends not to be used when the entire library is considered to be the same age group, and effectively is regarded as 'unlimited access'.

The <u>Circulations Profile</u> is a required field and contains the basic rules under which circulations can be made to the reader.

<u>OPAC</u> is a required field, but also includes a value effectively stating that the field is not in use. The OPAC field determines permissions allotted to the reader for access to the OPAC features of the application (Open Public Access Catalogue).

The <u>MysticAIR</u> field contains one or more licenses which may have been issued to the reader. The MysticAIR licenses are used to allow remote, read only access to the OPAC features of the application from trusted locations and without initial personal identification.

Expanse Personal Data - Reader

For higher levels of the Pergamon and Mystic application, it is possible to enable dynamic use of the Expanse Indexing System.

The Expanse indexing system is already used behind the scenes to control certain default data fields within the Pergamon and Mystic applications, but controlled specifically by the application and where applicable is already described here in this document (the majority of Expanse indexing use is within the Catalogue areas of the database, and therefore not applicable here).

Dynamic use of the Expanse indexing system by *end-users* permits the creation of locally defined data groups, and allocation to records within the database – including the reader records, and therefore may be argued to be personal data.

Where the Expanse indexing system is used to create reader specific indexing groups, and a range of values therein, an explanation as to *why* the group has been created in a justification form is required to be entered with the group.

These justifications are routinely reviewed by Esferico ltd. for suitability and may generate advise to the client, but in the end are solely the responsibility of the client organisation.

Note that simple justifications regarding functionality of the provided service are perfectly acceptable.

Case Study:

A school wishes to use the Pergamon or Mystic application to manage membership of after-school groups.

A new Expanse indexing group is created called 'After School Groups' which then has a range of values added such as 'Football', 'Chess', 'Art Club' etc.

The group appears within the Reader Manager dialogs, where end-users can attach any / several of the After School values.

Justification for this creation and use therefore simply comes down to normal, everyday provision of a school service.

Case Study:

A school enables the *protected characteristics* Expanse indexing system groups, which allow storage of religion, sexual preference etc. While the groups appear in the Reader Manager, no actual functional use is made of these values¹.

This use of Expanse indexing data would be <u>inappropriate and potentially a breach of the GDPR</u>, in which all data must have a valid and justified use in their recording.

Native Personal Data - Staff User

In order to provide administrative control of the Pergamon and Mystic applications, one or more Staff User accounts must be created. These accounts record:

- Login Name (Required)
- First Name (Required)
- Last Name (Required)
- Password (Required)
- Reader Link (Optional)
- Permissions (Required)

The <u>Login Name</u>, <u>First Name</u>, <u>Last Name</u>, <u>Password</u> and <u>Permissions</u> fields are all vital functional data fields required for the authorised access to and use of the application.

The Staff User record is a distinct, separately stored record of those users authorised to use the Pergamon or Mystic application at an administrative level. On occasion however, the staff user is *also* a valid reader within the library environment. The <u>Reader Link</u> provides an internal reference to associate the *Staff User* record and *Reader Record* together for convenience of use – accessing a Staff User account automatically provides the user with Reader Record functionality, and vice-versa. All functional activities (e.g. borrowing an item) are attached to the Reader Record (see earlier), with no further functional data being stored against the Staff User record.

¹ These groups are standard acknowledged groups within the database but are typically not enabled or used. Under *some* circumstances, recording of protected characteristics are useful in the provision of statistical information proving fair use of the library environment.

No address, contact or other personal data fields are recorded for Staff Users under the assumption that their creation (under the control of the client) is performed with due diligence and with suitable identification proofs having been made by the client prior to creation of the staff user account.

No functional requirement is inherent to the Pergamon or Mystic application at this time [of use solely by organisations] which justify the storage of such personal information.

Auditable Activity - Staff User

A range of activities are recorded for all Staff Users who have successfully logged into the application and then proceed to perform everyday functional operations. As part of these functional operations, Pergamon and Mystic perform levels of auditable recording against the staff record.

These activities are encoded into a fashion which can then be displayed / reported against for functional security requirements of the organisation.

Each auditable record stores:

- The unique internal Staff User reference number (which can be translated directly to the user account name etc.)
- The date and time of the activity
- The nature of the activity

This data is stored for justifiable security related functional operations of the application, but effectively do entail the creation of a personal activity record. They are recorded here for full disclosure.