Privacy Issues in Florida Libraries

SSNs, eReaders and Digital Rights Management, and Requests for Information about Library Users

Florida Libraries Association 2015
Orlando, Florida

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Today’s discussion:

1. The who, what, when, and why of Social Security numbers
2. Sharing more than you know: privacy issues with eReaders
3. Handling (aggressive) requests for information about library users
CAVEAT: Remember, nothing presented or discussed today should be construed as legal advice. If you have particular concerns about your library, you’ll need to contact legal counsel.
Bedrock Privacy Laws in Florida


§23: “Every natural person has the right to be let alone and free from governmental intrusion into the person's private life except as otherwise provided herein. This section shall not be construed to limit the public's right of access to public records and meetings as provided by law.”

§24: “(a) Every person has the right to inspect or copy any public record made or received in connection with the official business of any public body, officer, or employee of the state, or persons acting on their behalf, except with respect to records exempted pursuant to this section or specifically made confidential by this Constitution. This section specifically includes the legislative, executive, and judicial branches of government and each agency or department created thereunder; counties, municipalities, and districts; and each constitutional officer, board, and commission, or entity created pursuant to law or this Constitution.”

Fla. Stat. §119.07: Inspection and copying of records; photographing public records; fees; exemptions
Why does everyone want my social security number?
Social Security Numbers

Original purpose and “mission creep”

• The SSN was supposed to enable Social Security Board simply to maintain, for entitlement and benefit computation purposes, accurate records of workers’ earnings in jobs covered under the Social Security program.

• However, because SSNs are unique personal identifiers allowing easy linkage of personal information among different public and private entities, Congress gradually expanded the scope of its required and permissible uses.

• SSNs are a key piece of information used to commit identity theft, of which the FTC estimates as many as 9 million Americans are victims every year.

• Realizing this, the move to reduce overuse of SSNs began about 10 years ago, and now many legislative and executive measures have been enacted for this purpose.
Social Security Numbers

Government entities’ legitimate needs

• **Federal government**: IRS (taxes); federal agencies (workers’ compensation, VA hospital admissions).

• **State government**: WIC, Medicaid, enforcement of child support orders, drivers’ licenses, unemployment benefits, school lunch program.
  
  • *Fla. Stat. §119.071(d)(5) and (d)(6)* set out the bases under which state agencies can require your SSN.

• **The Privacy Act of 1974, 5 U.S.C. §552(a)**, requires that all government agencies (federal, state and local) that request SSNs provide a "disclosure" statement that explains whether providing it is mandatory or optional, how the SSN will be used, and under what statutory or other authority the request is being made.
Social Security Numbers

Private entities’ legitimate needs

- **Employers**: wage and tax reporting
- **Banks**: monetary transactions

Who else can ask for your SSN?

- Practically any other entity
  - Examples: mortgage companies, other lending institutions; medical service providers, health insurance providers, utility companies, phone companies.

You can refuse to provide it, but if you do, the entity may choose not to do business with you.
Social Security Numbers

When asked for your SSN, consider asking:

• Why is the SSN needed?

• Is disclosure of the SSN mandatory, and if so, under what legal authority?

• How will it be used?
  • Avoid allowing the SSN to be used as a personal identifier unless such use is specifically required by law (e.g., under the Social Security Act).

• What will happen if I decline to provide the SSN?

• Can another number or other information be substituted?
Social Security Numbers in Libraries

Guarding against inadvertent exposure of SSNs:

• Do not use SSNs as employee identifiers unless required by law.

• Maintain employee SSNs securely – consider NOT storing them on any computer drive.

• Make sure public-use computers do not retain any information after each user session (downloads, cache, browser history, use of “autofill” in forms).

• If your library chooses to assist users in filling out on-line forms, your library policy should clearly state that staff will not type in social security numbers (or drivers’ license numbers, credit card numbers, passwords, etc.).*

• Library staff should be advised not to type SSNs or other sensitive data into the computer, and never to keep user files on library computers.*

*http://dos.myflorida.com/library-archives/services-for-libraries/e-government/legal-risks-for-libraries/civil-liability/
eReaders, Reader Privacy, and Digital Rights Management: Sharing more than you know

"On the Internet, nobody knows you're a dog."

© The New Yorker Collection 1993
eReaders, Reader Privacy, and Digital Rights Management: Sharing more than you know

to

DID YOU EVER THINK ABOUT SELLING OUR DATABASE OF CUSTOMER INFORMATION?

IT WOULD BE MASSIVELY PROFITABLE WHILE VIRTUALLY UNDETECTABLE.

BUT HIGHLY UNETHICAL.

I DON'T KNOW YOU ANYMORE.

I'M YANKING YOUR CHAIN. WHEN DO WE START?

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Open Records Laws: library exception

Fla. Stat. §257.261: Library registration and circulation records

(1) All registration and circulation records of every public library, except statistical reports of registration and circulation, are confidential and exempt from the provisions of §119.07(1) and from §24(a) of Art. I of the State Constitution.

(2) As used in this section, the term “registration records” includes any information that a library requires a patron to provide in order to become eligible to borrow books and other materials, and the term “circulation records” includes all information that identifies the patrons who borrow particular books and other materials.

(3)(a) Except in accordance with a proper judicial order, a person may not make known in any manner any information contained in records made confidential and exempt by this section, except as otherwise provided in this section.
Open Records Laws: library exception

Fla. Stat. §257.261: *Library registration and circulation records*

**(3)(b)** A library or any business operating jointly with the library may, only for the purpose of collecting fines or recovering overdue books, documents, films, or other items or materials owned or otherwise belonging to the library, disclose information made confidential and exempt by this section to the following:

1. The library patron named in the records;
2. In the case of a library patron less than 16 years of age, the parent or guardian of that patron named in the records;
3. Any entity that collects fines on behalf of a library, unless the patron is less than 16 years of age, in which case only information identifying the patron's parent or guardian may be released;
4. Municipal or county law enforcement officials, unless the patron is 16 years of age, in which case only information identifying the patron's parent or guardian may be released; or
5. Judicial officials.
eReaders and DRM

Adobe’s e-reader software debacle

• In October 2014, a number of independent investigations established that each copy of Adobe® Digital Editions 4.0.0 was collecting and sending back to the company:
  • The list of books each copy of the software was used to read
  • Lists of books that were stored on an attached e-reader regardless of brand (SONY, KINDLE, NOOK, and BOYUE readers were tested), and even if those books had never been opened in ADE itself.
  • Adobe was transmitting this information unencrypted, so information about reading, browsing, and purchasing habits was available to anybody with an internet connection.

https://www.eff.org/deeplinks/2014/10/what-we-can-learn-adobe-e-reader-mess

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eReaders and DRM

Adobe’s e-reader software debacle

• Adobe admitted that its Digital Editions program was sending all this information in plain HTML text (unencrypted) and released ADE 4.0.1 within a week, but at first continued to deny that it was collecting information about readers’ library content.

• Only after it was shown that Adobe was collecting far more information than its privacy policy stated did the company begin working on a “fix.”

• Moral of the story: any DRM system is designed to protect the publisher’s rights, not yours, and you need to be aware that any e-reader platform collects certain information, and most collect information not strictly necessary to protect those rights.

What ADOBE ADE 4.0 tracked and transmitted:

Data transmitted by Digital Editions when Ars Technica opened an EPUB file of the cookbook Jerusalem by Yotam Ottolenghi

## Permissions Requests of Popular Android eReading Apps as of 12/19/2013

<table>
<thead>
<tr>
<th>Permission Request</th>
<th>Adobe Reader</th>
<th>Aldiko Book Reader</th>
<th>FBReader</th>
<th>Moon+ Reader</th>
<th>Zhi</th>
<th>Flipboard</th>
<th>comiXology</th>
<th>DC Comics</th>
<th>Mantano Book Reader Free</th>
<th>Marvel Comics</th>
<th>Nook</th>
<th>NYT Times</th>
<th>Sony Reader</th>
<th>Kindle</th>
<th>Google Play Books</th>
<th>Google Play Newsstand</th>
<th>Kobo</th>
<th>% of Apps with permission</th>
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<tbody>
<tr>
<td>Network: full network access</td>
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<tr>
<td>Network: view network connections</td>
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<td>System Tools: test access to protected storage</td>
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<td>Storage: modify or delete the contents of your USB storage</td>
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<td>Battery: prevent device from sleeping</td>
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<td>Accounts: find accounts on the device</td>
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<td>Network: receive data from Internet</td>
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<td>Phone: read phone status and identity</td>
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<td>Battery: control vibration</td>
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<td>Network: view Wi-Fi connections</td>
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<td>Accounts: add or remove accounts</td>
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<td>Accounts: use accounts on the device</td>
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<td>Location: approximate location (network-based)</td>
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<td>Location: approximate location (network-based) (Apps run at startup)</td>
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<td>Location: approximate location (network-based) (Sync: read sync settings)</td>
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<td>Location: approximate location (network-based) (Sync: toggle sync on and off)</td>
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<td>Location: approximate location (network-based) (Accounts: create accounts and set passwords)</td>
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<td>Location: approximate location (network-based) (Accounts: read Google service configuration)</td>
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<td>Location: approximate location (network-based) (Apps: retrieve running apps)</td>
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<td>Location: approximate location (network-based) (System tools: modify system settings)</td>
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<td>Location: approximate location (network-based) (Sync: read sync statistics)</td>
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<td>Location: approximate location (network-based) (System tools: access USB storage filesystem)</td>
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<td>Location: approximate location (network-based) (System Tools: read subscribed feeds)</td>
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<td>Location: approximate location (network-based) (System Tools: send sticky broadcast)</td>
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<td>Location: approximate location (network-based) (System Tools: write subscribed feeds)</td>
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<td>Total number of permissions requested by app</td>
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</table>
Suggested approaches to library provision of eReader devices:

• Make sure library staff understand how eReader programs work and that they can provide basic explanations to users or direct them to materials that provide such explanations.

• You should consider §257.261 carefully: if the eReader device is providing ANY user data back to its mother ship, what is the effect on readers’ privacy?

• Provide information sheets that outline how information about the readers’ library content, browsing habits, etc. may be transmitted back to the eReader vendors’ servers.

• Include links to each vendor’s privacy policy and end user agreement so that readers can access the information they need to make an informed decision about using eReaders.
Suggested approaches to library provision of e-material:

• If your library simply makes e-materials available for users to download to their own devices, you should still think about the privacy implications, and you should still:

• Provide information sheets that outline how information about the readers’ library content, browsing habits, etc. may be transmitted back to the eReader vendors’ servers.

• Include links to each vendor’s privacy policy and end user agreement so that readers can access the information they need to make an informed decision about using eReaders.
Suggestions from Gary Price, *Adding Transparency to the Ebook Transaction*, LIBRARY JOURNAL, June 25, 2013 (i.e., even before the Adobe debacle):

- From the outset, make it clear in various locations, in training sessions, etc. that if patrons choose to access a book on a Kindle device, Amazon becomes aware of it. Only placing this information in the terms of service or privacy policy does not suffice. Some might argue that if the library user is “so interested” in privacy they’ll take the time to read the terms of service and privacy policy. But while people should read these documents, in most cases they don’t. Since libraries are about providing access to information, we should make this information as accessible as possible.

- As the user clicks to have the book delivered to his or her Kindle, a warning should appear explaining in clear language what’s about to happen in terms of privacy. The user can simply click, acknowledge, and move on. The warning would not appear again until some point in the future.

- The library website and staff should provide clear instructions to users on how to remove the information on the titles they’ve borrowed from the library from the Amazon database.

- The library community has taken reader privacy very seriously for a very long time, and been the recipient of a lot of well-deserved praise for it. Now is certainly not the time to give up on these important beliefs and goals.

In fact, we should being doing more to explain how important privacy is to libraries in the digital age. That needs to begin with librarian education. We must have a clear understanding of how the Internet works and the tools and techniques that can be used to help make the Internet as private as possible. This is a never-ending responsibility since the technology is constantly changing.
Let’s Get Real:
What do I do when someone demands information about library users?*

*and doesn’t want to take “no” for an answer
Open Records Laws: library exception

Fla. Stat. §257.261: Library registration and circulation records

(1) All registration and circulation records of every public library, except statistical reports of registration and circulation, are confidential and exempt from the provisions of §119.07(1) and from §24(a) of Art. I of the State Constitution.

(2) As used in this section, the term “registration records” includes any information that a library requires a patron to provide in order to become eligible to borrow books and other materials, and the term “circulation records” includes all information that identifies the patrons who borrow particular books and other materials.

(3)(a) Except in accordance with a proper judicial order, a person may not make known in any manner any information contained in records made confidential and exempt by this section, except as otherwise provided in this section.
Open Records Laws: library exception

Fla. Stat. §257.261: Library registration and circulation records

(3)(b) A library or any business operating jointly with the library may, only for the purpose of collecting fines or recovering overdue books, documents, films, or other items or materials owned or otherwise belonging to the library, disclose information made confidential and exempt by this section to the following:

1. The library patron named in the records;
2. In the case of a library patron less than 16 years of age, the parent or guardian of that patron named in the records;
3. Any entity that collects fines on behalf of a library, unless the patron is less than 16 years of age, in which case only information identifying the patron's parent or guardian may be released;
4. Municipal or county law enforcement officials, unless the patron is 16 years of age, in which case only information identifying the patron's parent or guardian may be released; or
5. Judicial officials.
Open Records Laws: library exception

Library policies regarding patron privacy:

• Should be clearly written and conspicuously available (e.g., on library website and on paper at circulation desk).

• Say (clearly) what you, and do what you say. Uniformly.

• The less room there is for individual decision-making and initiative, the fewer problems you’re likely to have.

• Complaints about policies.

• Have clear procedures that explains how users can file a complaint about the library’s user privacy policy and how the complaint will be handled.
Dealing with demands from government and private entities

Governmental entities

• Patriot Act: Amendments now being considered (May 2015).
• Criminal: law enforcement: warrant or subpoena required.
• Civil lawsuit with government litigant: subpoena or court order required.

Responding to governmental demands

• Have step-by-step procedures for any library personnel who might be confronted with a demand (include evening and weekend personnel).
• Have senior personnel available “on call” for on-duty personnel (library director, city/county counsel or attorney, etc.) with phone number at which they can be reached to assist in responding.
Non-governmental entities

Civil litigation

• Subpoena or court order required before library should respond.
  • If library is a litigant (i.e., party to the lawsuit), it may receive a “discovery request.”

• Have step-by-step procedures for any library personnel who might be confronted with a demand (include evening and weekend personnel).

• Have senior personnel available “on call” for on-duty personnel (library director, city/county counsel or attorney, etc.) with phone number at which they can be reached to assist in responding.

Responding civil litigation information requests

• Same approach as when responding to governmental requests.
Dealing with aggressive requests for user information

• Have a written library statement setting forth §257.261 and explaining it for users.

• Provide training for all staff members to make sure employees (and any volunteers) understand what their legal obligations are (and aren’t).

• Consider using role-playing scenarios, where library staff practice responding to aggressive requests so that they are not faced with the situation for the first time in “real life.”

• Arrange for at least one senior staff member to be “on call” during off hours to help on-duty staff handle requests, and/or make sure staff know whom to contact if they need legal assistance (e.g., city counsel or advisor).
Resources and further reading


Let’s Get Real