

Privacy statement for Alma

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About the privacy statement

This privacy statement describes how the data controller processes your personal data in the service. The purpose of this privacy statement is to inform you about what personal data we process, how it is processed, who is responsible for the processing, what your rights are and who you can contact.

What are personal data?

Personal data are all forms of data, information and assessments that can be linked to you as a person, cf. [the Personal Data Act](#) Section 2 and [the GDPR](#) Article 5(1). The decisive factor as to whether data constitutes personal data is whether it can be linked to a specific person. Data that, on its own, cannot be linked to an individual person may constitute personal data, in cases where the data are found together with other data.

The service in brief

Alma is an app and a platform for digital library services. Alma defines the library rules, users and rights, and supports processes for acquisitions, loans, administration of inventory and metadata, financial management and reporting. Alma is integrated with a number of systems for data exchange related to the library's work processes.

The service does not allow processing of sensitive personal data.

The purpose of personal data processing in the service

The service processes different types of personal data for the following purposes:

Types	Description	Purpose of processing
Administrative users	Librarians and administrative staff. User support.	Administration, configuration and daily service operations.

Borrowers	All categories of borrowers. Includes students, employees, temporary employees and walk-in users (temporary users and persons outside the institution).	To order material and use library services.
Contact persons	Contact persons for services affiliated to the library, for example the contact point for suppliers (material), system integration and user support.	Library services management.
Bibliographic data – persons referred to in the metadata	Persons registered in open bibliographic data (metadata). Includes information about authors and the authors' connection to the publication.	Bibliographic metadata are necessary for cataloguing and finding material.
Bibliographic data – persons referred to in the content	Personal data referred to in the content, such as biographical material.	To provide content to the public.

Registered personal data, legal grounds and storage time

Personal data related to user accounts in the service requires consent as legal grounds, cf. [the Personal Data Act, and the GDPR](#) Article 6(1)(a).

Registered personal data about authors and contact persons are covered by [the Personal Data Act, and the GDPR](#) Article 6(1)(f) – to perform a task on grounds of legitimate interests.

The service does not allow processing of sensitive personal data. In cases where the users themselves can write information in the comments field and similar, the user is obliged to meet the requirements and guidelines for the service. Users are not permitted to register sensitive personal data about themselves or others or to use the service for defamatory conduct.

The data controller is entitled to store information for statistical purposes, if this is in the interests of society at large, cf. [the Personal Data Act](#) Section 8 and [the GDPR](#) Article 6(1)(e).

The following personal data are processed in the service.

User data

Type of data	Description	Source
Basic user data	Information necessary to identify and manage users in Alma (first name, middle name, last name, data of birth, expiry date, date for erasure, person loaning on another's behalf)	Alma, Feide
Descriptive information	Information to address users of the service. Title, job description, gender, preferred language.	Alma. May also be sent from the data controller's other source systems
Contact information	Users' contact information Email (type, address, preferred) Phone number (type, number, preferred) Preferred number for text messages Address (type, details, preferred)	Alma. May also be sent from the data controller's other source systems
Notes	Notes related to the users that are registered by the librarian in order to assist and follow up the library's users. Should not contain sensitive personal data.	Alma
Appendices	System generated and manually composed notifications to the user, such as collection messages and reminders. Stored to document dialogue with the user. As a rule, these are not automatically erased, but each library must set erasure by a defined time limit. The notification must not contain sensitive personal data.	Alma
Statistics	Aggregated statistics relating to use of the system. Anonymised loan and search statistics.	Alma
User groups	Grouping of users to use alongside borrowing rules or to award administrative privileges.	Alma
Information about administrative users	Information about administrative users of the service to adapt functionality and extend access management. Cataloger level.	Alma
Information about borrowers	Information related to the borrower. Preferred remote loan library, preferences in connection with letters and notifications.	Alma

Requirements	Active fees and reminders. History (Fine/Fee type, Comment, Fee owner, Title, Item Barcode, Original Amount)	Alma
Blocks	Library staff can block borrowers' accounts using a reason code, comment and expiry date to stop further borrowing. Can be manually overridden. History.	Alma
Orders/reservations	Orders and reservations for loan items.	Alma
Loans, active transactions	Active loans on loan items. The loan history is not stored.	Alma

Technical user data

Type of data	Description	Source
System identities	Identities in the service and the integrated system (type, value and notes field).	Alma, Feide and other integrated systems.
System roles and affiliation to the organisation	The user is assigned roles in the system in order to provide adapted functionality and access to the service.	Alma. Roles can be assigned in Alma based on information from other source systems, such as Feide.
Session information and cookies	Information related to the user's dialogue with the service. Necessary to adapt functionality in the service and to authenticate users.	Alma
Log	Log of system use related to the logged-in user and/or their IP address. The purpose of logs is to ensure security and integrity in the system, provide user support and analyse use of the service. The data collected include time, user ID, IP address, information about browsers and hardware, session information and other information that browsers normally provide.	Alma
Information related to authentication of users	Information for secure authentication of users. <ul style="list-style-type: none"> - User password set up directly in Alma. - Pin code to use together with the loan card when using a self-service machine or similar – provides two-factor authentication of borrowers. 	Alma. May also be sent from the data controller's other source systems

Other personal data

Type of data	Description	Source
Contact information	Contact persons and contact points for services affiliated to the library, for example material and equipment suppliers, and user support.	Alma
Bibliographic data – persons referred to in the metadata	Information about authors and their connection to the publication, and any other contributors to the publication.	Alma, the national authority register or external sources such as publishers and other bibliographical registers.
Bibliographic data – persons referred to in the content	Personal data referred to in the content, such as in biographical material.	Alma or external content services.

Information about your activity is stored in order to provide user support and to gain an impression of general use of the service.

Personal data is stored until one of the following occurs:

- User consent is withdrawn
- The purpose of the personal data processing has been fulfilled
- The data controller decides to discontinue the service

Logs and backups of the system data are stored for up to one year.

Automatic case processing

Your personal data will not be subject to profiling. The library service has automated procedures for borrowing, returning, sending reminders and issuing fees.

Disclosure of your personal data to third parties

Disclosure or export of data is defined as all disclosure of data aside from to the service's own system/processing or to the data subjects themselves, or to someone who receives data on their behalf.

Your personal data will be disclosed to the following countries outside the EU/EEA:

- Israel, through the subcontractor Ex Libris GmbH. Israel is on the EU Commission's [list](#) of approved countries that have adequate data protection.

Your personal data will be disclosed to Unit/BIBSYS, which is the service provider, and to its subcontractors.

Subcontractors	Function
Ex Libris GmbH	Cloud management and development of Alma, Oria and related library services.
NTNU	Premises for server management for Unit's direct services.
Blue Safespring AB	Cloud management and backup for Unit's direct services.
UNINETT AS	Delivers Feide, for authentication of users of the services.

The subcontractors' staff who need the personal data to perform their work will have adapted access in order to provide user support and any rectification of errors in the service.

Security in relation to your personal data

Personal data processed in the service are secured by several measures. All transfers to and from the service are encrypted. Unit/BIBSYS conducts regular risk and vulnerability analyses and tests the security of the service to ensure your personal data are safe. Security measures employed by our subcontractor Ex Libris are documented [here](#).

Employees who process your personal data are subject to a duty of confidentiality, which also applies to our subcontractors' employees.

Your rights

Right to information and access

You have a right to receive information about how your personal data are processed in the service. This privacy statement has been produced to provide the information you have a right to receive. You also have a right to see/access your personal data that are

registered in the service, and other personal data that are collected after you have actively logged in. You also have the right to request to receive a copy of your personal data.

A self-service solution in the service where users can see their personal data after logging in allows users to exercise their right of access. If the service does not provide complete information via the self-service solution, users can send a written enquiry to the data controller to acquire access to more detailed information.

Right to rectification

You have a right to have inaccurate personal data about you rectified. You also have a right to have incomplete personal data about you supplemented. If you feel that the service shows inaccurate or incomplete personal data, please contact the data controller, stating the reason why the personal data are inaccurate or incomplete.

Right to restriction of processing

In certain cases, you may have a right to request restrictions on the processing of your personal data. Restricted processing means that the personal data will still be stored, but that other processing in the service is restricted. To request restricted processing of personal data, the conditions in the Personal Data Act and the GDPR Article 18 must be met. You can request restricted processing

- Pending the data controller rectifying inaccurate or incomplete personal data
- If you have submitted an objection to the processing (see below for more details)
- If the personal data are necessary to establish or defend a legal claim

If restricted processing is granted, the data controller will notify you before the restriction is lifted.

Right to erasure

You have the right to demand that we erase personal data about you. If you would like your personal data erased, please contact the data controller or use the erasure function in the service. It is important that your request states why you want your personal data erased and, if possible, what personal data you wish to be erased.

Please note that legislation provides exemptions from the right to erasure in some cases. This could be cases where we process personal data to fulfil a statutory duty or to address important social interests, such as archiving, research and statistics.

Right to object

You have a right to object to processing of your personal data on certain conditions defined in the [GDPR](#) Article 21. This applies if:

- Legal grounds for the processing of personal data are based on legitimate interests, reasons of public interest or when exercising public authority
- Processing of personal data entails direct marketing or profiling
- Personal data are processed for scientific or historical research purposes or statistical purposes

The service does not generally satisfy these conditions, with the exception of the processing of author information and in cases where personal data are used for statistical purposes. When personal data are used for statistical purposes, the data are anonymised.

However, please note the following:

- If there is a special need to stop the processing, for example if you have a need of protection, or a confidential address or similar, please contact the data controller.
- When you have consented to the processing of personal data, you have a right to withdraw your consent.

Right to complain about the processing

If you feel that we have not processed personal data in a correct or lawful manner, or if you feel that you have been unable to exercise your rights with us, you have a right to complain about the processing. See our contact details below.

If we do not uphold your complaint, you have the possibility of filing a complaint with the Norwegian Data Protection Authority. The Data Protection Authority is responsible for ensuring that Norwegian enterprises comply with the provisions of the Personal Data Act and the GDPR in their processing of personal data.

Contact

The data controller

The institution is the data controller for personal data in the service and is the primary contact for end users. See [link](#).

The data processor

Unit develops and manages the service on behalf of the data controller and has the role of data processor.

Unit user support's contact details

<http://support.bibsys.no>

Tel. +47 958 24 000

Email: support@bibsys.no