



What You Need to Know About Addressing GDPR Data Subject Rights in Rapido

Version 1.1



Not Legal Advice

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Disclaimer

This paper is based on Ex Libris' understanding of certain requirements of the GDPR. However, the application of the requirements of the GDPR is highly fact specific, and many aspects and interpretations of GDPR are not well-settled.

As a result, this paper is provided for informational purposes only and should not be relied upon as legal advice or to determine how GDPR might apply to you and your organization. We encourage you to work with a qualified legal professional to discuss GDPR, how it applies specifically to your organization, and how best to ensure compliance.

Introduction

Ex Libris is committed to General Data Protection Regulation (GDPR) compliance across all of our products and services. We have closely analyzed the requirements of the GDPR, and our engineering, product, security and legal teams have been working to align our procedures, documentation, contracts and services to support compliance with the GDPR. We also support our customers with their GDPR compliance journey with our strong foundation of certified security and privacy controls.

This paper describes tools and capabilities built into Rapido that can assist your organization in addressing data subject rights and requests as a *controller* under the GDPR of personal data processed on Rapido.

Definitions

Personal Data means any information relating to an identified or an identifiable natural person (**Data Subject**); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

Controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. Where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law. With respect to the use of Rapido, the customer is the **controller**.

Processor means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller. With respect to the use of Rapido, Ex Libris is the **processor**.

Data Subject is an identified or an identifiable natural person to whom personal data relates (e.g., patrons and staff).

As you read through this paper, keep in mind that your compliance with the GDPR involves your role as the **controller** and Ex Libris as the **processor**.

Summary of Data Subject Rights

The rights of data subjects provided by the GDPR include the following:

1. *Right to be Informed (Article 13, 14 GDPR)*

The right to be informed encompasses your obligation to provide '*fair processing information*', typically through a privacy notice. It emphasizes the need for transparency over how you use personal data.

2. *Right of Access (Article 15 GDPR)*

Under the GDPR, individuals have the right to obtain:

- Confirmation that their data is being processed
- Access to their personal data; and
- Other categories of information - some of which should be provided by the controller in a privacy notice (see Article 15).

3. *Right to Rectification (Article 16 GDPR)*

Individuals are entitled to have their personal data rectified if it is inaccurate or incomplete without undue delay. If you have disclosed the personal data in question to third parties, you must inform such third parties of the rectification unless this proves impossible or involves disproportionate effort. You must also inform the individuals about the third parties to whom the data has been disclosed where requested.

4. *Right to Erasure (Article 17 GDPR)*

This right is also known as the *Right to be Forgotten*. It enables an individual to request the deletion or removal of personal data where there is no compelling reason for its continued processing.

Individuals have the right to have their personal data erased and to prevent further processing of their personal data in specific circumstances delineated in the GDPR, such as:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.
- When the processing was based on consent, and the individual has now withdrawn their consent.
- When the individual objects to processing and there are no overriding legitimate grounds for continuing the processing.
- The personal data was unlawfully processed.
- The personal data has to be erased in order to comply with a legal obligation in Union or Member State law to which the controller is subject.

There are circumstances described in the GDPR where the right to erasure may not apply and a controller can resist a request for erasure.

5. *Right to Restrict Processing (Article 18 GDPR)*

When this right is exercised you are permitted to store the personal data but not further process it. The *Right to Restrict Processing* applies in the specific circumstances set forth in the GDPR, including:

- Where an individual contests the accuracy of the personal data, then processing should be restricted for a period enabling the controller to verify the accuracy of the personal data.
- When processing is unlawful and the individual opposes erasure and requests restriction instead.
- If you no longer need the personal data but are required by the individual to establish, exercise or defend a legal claim.

- Where an individual has objected to processing for reasons specified in the GDPR, pending the verification whether the legitimate grounds of the controller override those of the individual.

6. *Right to Data Portability (Article 20 GDPR)*

This right allows individuals to receive the personal data the individual provided to a controller in a structured, commonly used and machine-readable format and to transmit such data to another controller, without hindrance from the original controller. In exercising this right, the individual shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

The *Right to Data Portability* applies where the individual has given consent to the processing of their personal data for one or more specific purposes, or where processing is carried out by automated means or in other circumstances specified in the GDPR.

7. *Right to Object (Article 21 GDPR)*

Individuals have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data which is based on certain specified provisions of the GDPR, including when the processing was being performed on the basis of Legitimate Interest, Public Interest or Direct Marketing, including profiling based on those provisions.

8. *Right Related to Automated Decision Making and Profiling (Article 22 GDPR)*

The GDPR provides safeguards for individuals against the risk that a potentially damaging decision is taken without human intervention.

Individuals have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning the individual or similarly significantly affects the individual. The GDPR provides certain exceptions and conditions to this right.

9. *Right Related to Data Breach Notification (Article 34 GDPR)*

The GDPR introduces a duty on controllers to report certain types of data breaches to the relevant supervisory authority, and in some cases to the individuals affected by the breach.

A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed. Where a breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller is required to communicate the personal data breach to the data subjects without undue delay.

Addressing GDPR Data Subject Rights with Rapido

The following section describes the capabilities of Rapido that can assist customers in complying with the rights of data subjects. We have provided the information once for Patrons as the Data Subject and once for Staff users as the Data Subject.

1. Rights of Data Subjects – Patrons

Data Subject Right	Corresponding Rapido Functionality
Right to be Informed	Ex Libris provides comprehensive documentation regarding Rapido. Upon request, Ex Libris will provide you with additional relevant information you may need for addressing the Right to be Informed in relation to the processing of personal data by Rapido.
Right to Access	All Patron Usage Data is stored in Alma platform. The information can be retrieved by the library through Alma Analytics. Refer to Data Fields Used in Rapido for detailed information about the data maintained in Rapido/Alma.
Right to Rectification	The user profile containing basic information about the user such as email and address is managed in Alma and can be edited or deleted. See here for more information on managing basic user details in Alma.
Right to Erasure (Right to be Forgotten)	The user profile containing basic information about the user such as email and address is managed in Alma and can be edited or deleted. Information on deleting individual student usage data can be found here . See Data Fields Used in Rapido for detailed information about data in Rapido.
Right to Restrict Processing	Should a Data Subject wish to object to the processing of their personal data, the individual's user record could be deleted. In addition, customers have the ability to provide shared/anonymous accounts to users who are entitled to restrict processing of their data.

Right to Data Portability	<p>Rapido offers the ability to export personal data in standard formats using standard API export functionality. Please see here information about the “Get User Details” API</p>
Right to Object	<p>Rapido provides you with the full ability to determine which Patrons to include in the data stored. Patrons that exercise their “right to object” could be excluded from the patron data load. Patrons may also be deleted as described above.</p>
Right related to Automated Decision Making and Profiling	<p>Any profiling or automated decision-making is determined and set by the customer.</p>
Right related to Data Breach Notification	<p>Ex Libris has procedures for data breach handling including notification. In the case of a personal data breach, Ex Libris will, as soon as possible after having become aware of it, notify the customer.</p> <p>The notification will:</p> <ul style="list-style-type: none"> • Describe the nature of the personal data breach • Communicate the name and contact details of the Ex Libris Data Protection Officer • Describe the likely consequences of the personal data breach • Describe the measures taken or proposed to be taken by Ex Libris <p>When required by the GDPR, the institution/library as Data Controller, is responsible for notifying the Supervisory Authorities and the affected data subjects.</p> <p>Ex Libris Security Incident Response Policy is available in the Ex Libris Knowledge Center - here</p>

2. Rights of Data Subjects – Staff

The following section describes the capabilities of Rapido that can assist customers in complying with the rights of the data subjects with respect to its staff.

Data Subject Right	Corresponding Rapido Functionality
Right to be Informed	Ex Libris provides comprehensive documentation regarding Rapido. Upon request, Ex Libris will provide you with additional relevant information you may need for addressing the Right to be Informed in relation to the processing of personal data by Rapido.
Right to Access	As Rapido is part of the Alma (higher education) platform, Staff information is managed in Alma. Please refer to What You Need to Know About Addressing GDPR Data Subject Rights in Alma for detailed information.
Right to Rectification	As Rapido is part of the Alma (higher education) platform, Staff information is managed in Alma. Please refer to What You Need to Know About Addressing GDPR Data Subject Rights in Alma for detailed information.
Right to Erasure (Right to be Forgotten)	As Rapido is part of the Alma (higher education) platform, Staff information is managed in Alma. Please refer to What You Need to Know About Addressing GDPR Data Subject Rights in Alma for detailed information.
Right to Restrict Processing	As Rapido is part of the Alma (higher education) platform, Staff information is managed in Alma. Please refer to What You Need to Know About Addressing GDPR Data Subject Rights in Alma for detailed information.
Right to Data Portability	As Rapido is part of the Alma (higher education) platform, Staff information is managed in Alma. Please refer to What You Need to Know About Addressing GDPR Data Subject Rights in Alma for detailed information.

Right to Object	<p>As Rapido is part of the Alma (higher education) platform, Staff information is managed in Alma.</p> <p>Please refer to What You Need to Know About Addressing GDPR Data Subject Rights in Alma for detailed information.</p>
Right related to Automated Decision Making and Profiling	<p>Any profiling or automated decision-making is determined and set by the customer. Generally, reports and task lists generated in Rapido are designed to be used by humans for decision making.</p>
Right related to Data Breach Notification	<p>Ex Libris has procedures for data breach handling including notification. In the case of a personal data breach, Ex Libris will, as soon as possible after having become aware of it, notify the customer.</p> <p>The notification will:</p> <ul style="list-style-type: none"> • Describe the nature of the personal data breach • Communicate the name and contact details of the Ex Libris Data Protection Officer • Describe the likely consequences of the personal data breach • Describe the measures taken or proposed to be taken by Ex Libris <p>When required by the GDPR, the institution/library as Data Controller, is responsible for notifying the Supervisory Authorities and the affected data subjects.</p> <p>Ex Libris Security Incident Response Policy is available in the Ex Libris Knowledge Center - here</p>

1. Data Fields of User in Rapido

The following table lists the data fields that, based on the customer's decision, can be used to hold personal data provided by the customer. Next to each data field we have indicated whether the field is mandatory for normal Rapido operations.

Category	Field	Mandatory	Functional Use in the System	Additional information
General Information	First name	Yes	<p>The name is shown in different interfaces to help the library staff identify the person to whom the service is given, for example, when the user approaches a circulation desk to receive services. The name may also be inserted into letters sent by the system to the patron.</p> <p>There is no other use of this field</p>	

Category	Field	Mandatory	Functional Use in the System	Additional information
	Middle name		<p>The name is shown in different interfaces to help the library staff identify the person to whom the service is given, for example, when the user approaches a circulation desk to receive a service. The name may also be inserted into letters sent by the system to the patron</p> <p>There is no other use of this field</p>	
	Last name	Yes	<p>The name is shown in different interfaces to help the library staff identify the person to whom the service is given, for example, when the user approaches a circulation desk to receive a service. The name may also be inserted into letters sent by the system to the patron</p> <p>There is no other use of this field.</p>	

Category	Field	Mandatory	Functional Use in the System	Additional information
	Primary identifier	Yes	Visible ID that is used to fetch a user record in the relevant functional context (e.g. when performing a resource sharing request). Functionally, it has the same use as any other user identifier – i.e. allows to uniquely identify a user as part of a given process, e.g. login, request.	
	Title		There is no functional use of this field. May be configured for use as a salutation in notifications that are addressed to the user.	
	PIN number		May be used by a selfcheck machine as a password in order to authenticate the self-check action (via SIP2 protocol). There is no other use of this field.	

Category	Field	Mandatory	Functional Use in the System	Additional information
	Job category		May be used as input for determining fulfillment policies that will be applied to the user, and as an input that will determine automatic assignment of roles to a user.	Stores the job category definition to which the user belongs based on the Job Categories code table.
	Job description		There is no functional use of this field.	A textual description of the user's job.
	Gender		There is no functional use of this field.	Possible values: male, female, none, other
	User group		The user group is used to assign fulfillment rules to the user, determining the fulfillment policies that will be applied to the user.	Stores the group with which the user is associated such as Faculty, Graduate, or Student.
	Campus		The user's campus affiliation may be used to determine some attributes of fulfillment policies, such as allowed pickup locations for requests.	Stores the campus code of the user.

Category	Field	Mandatory	Functional Use in the System	Additional information
	Preferred language		Determines the language that will be used by the system when sending notifications to the patron (if one of the supported languages is selected).	Stores the default language of the user.
	Birth date		Stores the birth date of the user. There is no other functional use for this field.	
	Expiration date		Determines when the user record will be considered inactive, i.e. the user will not be allowed to create requests or be able to login.	
	Purge date		Determines the date on which the record will be automatically deleted (unless the user has pending liabilities such as requests or fees).	
	Resource sharing library		The library that will manage resource sharing requests placed by the patron.	

Category	Field	Mandatory	Functional Use in the System	Additional information
	Selected Patron Letters		This field allows for opting out of specific library notices for specific patrons	A list of library notices will display.
Contact Information (multiple records)	Email types	Yes	This field defines whether the email is a work email or a personal email. There is no functional use of this field.	
	Email address	Yes	The system will send library notices to this email address (if it is 'preferred', see next field).	
	Preferred email	Yes	The system will send library notices only to the email address that is labeled as 'preferred'.	
	Phone types		This field defines whether the phone is a work phone or a personal phone. There is no functional use of this field.	

Category	Field	Mandatory	Functional Use in the System	Additional information
	Phone number		Used by the library to send phone notifications (i.e. SMS) or contact the patron.	
	Preferred phone number		This field defines whether the library should use this phone number for contacting the patron.	
	Preferred SMS		If SMS is used, the system will use the phone number that is labeled as 'preferred' for creating the SMS.	
	Address types		This field defines whether the address is a work address or a home address. There is no functional use of this field.	

Category	Field	Mandatory	Functional Use in the System	Additional information
	Address details (multiple fields)		This field defines the physical address by which the patron may be reached. This field is used to send resources requested by the patron if that is allowed by the institution.	
	Preferred address		This field defines the preferred address to contact the patron. There is no functional use of this field.	
Identifiers (multiple records)	Identifier Type		The intended use of the ID. IDs may be used by patrons for login, to fetch a user record, or by library systems for integration with the system (such as student IDs).	
	Value		The value is used during login for authentication, or in order to fetch a user record in the different functional contexts, for example for loaning an item to the patron.	IDs may be unique across the system, or may be set to be unique only per their type.
	Note		An internal library field to add comments and notes. There is no functional use of this field.	

Category	Field	Mandatory	Functional Use in the System	Additional information
Notes (multiple records)	Note		Notes are displayed for the library staff when facing the patron (patron services workbench). The notes may also be displayed in the Primo interface (to the owning patron). There is no other functional use of this field.	
Blocks (multiple records)	Block description		The block description will be shown to the staff when a patron's activity (such as loans) is blocked. It will also be shown to the patron in Primo.	
	Expiry Date		The block will be ignored by the system after this date.	
	Note		An internal library field to add comments and notes. There is no functional use of this field.	

Category	Field	Mandatory	Functional Use in the System	Additional information
Fines and fees (multiple records)	Fine/Fee type		The context of the fee – e.g. overdue loan fee, card renewal fee, lost item fee	Notices may be sent based on a fee type, for example to all patrons who owe more than a defined amount of overdue fines, ignoring lost item fines.
	Comment		This field is used for adding additional information about the fee, such as the reason for the fee. The field is displayed to users with the relevant privileges. There is no functional use of this field.	
	Fee owner		Notices may be sent based on a fee owner, for example to all patrons who owe a given sum to a given library.	The library (or institution) that is owed the fee.
	Title		This field is used to determine whether the fee is linked to an item. This is the title of the item. There is no functional use of this field.	

Category	Field	Mandatory	Functional Use in the System	Additional information
	Item Barcode		<p>This field is used to determine whether the fee is linked to an item, this is the barcode of the item.</p> <p>There is no functional use of this field.</p>	
	Original Amount		The charged fee as the fee was created, before it was partly paid or waived.	
Statistics	Statistical Category		The field is used for Analytic reporting purposes only. There is no functional use of this field.	
	Category Type		The field is used for Analytic reporting purposes only. There is no functional use of this field.	
	Note		An internal library field to add comments and notes. There is no functional use of this field.	
Attachments	File name		The name given to an attached file. There is no functional use of this field.	

Category	Field	Mandatory	Functional Use in the System	Additional information
	Type		The type of the file attached (i.e.: WORD, PDF etc.). There is no other functional use of this field.	
	Size		The size of the attached file. There is no other functional use of this field.	
	URL		In the case where a URL link is used to a file. There is no other functional use of this field.	
	Notes		An internal library field to add comments and notes. There is no functional use of this field.	
Proxy	Proxy for		A user may borrow items on behalf of a user that is listed in this field.	

Additional information can be found in Online Help:

- [Managing Users](#)
- [User Details in Analytics](#)
- [Data Privacy FAQs](#)