



Ex Libris

Alma Privacy Impact Assessment

August 2020



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2 - Disclaimer

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3 - Purpose of this document

The Privacy Impact Assessment (PIA) is a process that identifies what impact a project, initiative or general collection, and use of information might have on the privacy of individuals. A PIA is a point-in-time assessment, and the resultant report and other outputs should be revisited as changes occur to the processes that were originally assessed.

This PIA includes a brief description of the data processed in the Alma service, the privacy impact, and the measures Ex Libris is taking in order to manage the risks involved.

4 - Main Findings and Conclusions

We have reviewed the privacy risks regarding Alma SaaS platform and the privacy and security controls designed to mitigate those risks.

It should be noted that Ex Libris is a data processor, therefore, some of the personal data-relating processes are the responsibility of the data controller (Ex Libris customers), such as consent management.

Individuals' personal data in Alma is limited in nature and the inherent risks resulting is not high. The privacy controls designed and implemented comply with GDPR requirements, relating to the business processes of Alma.

After reviewing all material GDPR aspects, the privacy risks and implemented controls, any residual risk that we found was minimal. Our impression is that Ex Libris efforts in implementing GDPR requirements are well managed, resulting in a good level of compliance. Ex Libris has also appointed a Data Protection Officer (DPO).

One of the main principles of GDPR is Privacy by Design, which means promoting privacy principles throughout product and process development from the start, and maintaining this while products and services are developing. In order to maintain compliance, Ex Libris will need to continue their practice of making the privacy of its customers a core value, and lead by example for other SaaS vendors in the market.

5 - Scope and Plan

This PIA scope is the Alma service, where Ex Libris is the data processor. The purpose for data processing is to manage print, electronic, and digital materials in a single interface for Ex Libris customers.

6 - Data Elements

Data needed for processing – information about the data subjects (library patrons) are provided by the Ex Libris customer (library authority). Additional personal data updates are done by the library staff when needed, and the processes involved are the sole responsibility of the library, which is the data controller.

Following is a list of data elements related to the data subject (patron), processed by Alma All of the data elements are related to the patron.

Data Field	DB Table
USER_NAME	HFRUSER
EXTERNAL_ID	HFRUSER
FIRST_NAME	HFRUSER
LAST_NAME	HFRUSER
MIDDLE_NAME	HFRUSER
CITY	USER_ADDRESS
POSTAL_CODE	USER_ADDRESS
COUNTRY	USER_ADDRESS
STATE_PROVINCE	USER_ADDRESS
EMAIL	USER_EMAIL
PHONE	USER_PHONE
WEB_SITE_URL	HFRUSER , USER_WEB_ADDRESS
BIRTH_DATE	HFRUSER
GENDER	HFRUSER

6.1 - Data sharing

Information is not shared by Ex Libris with any third party organizations or individuals. The Ex Libris customer determines how and what information is shared with third parties. Notice about information collection and sharing is detailed in: <https://www.exlibrisgroup.com/privacy-policy-1-2/>

6.2 - Data Flows

Data is collected and provided by the library management (data controller), which provide library services for the patrons (data subjects) and import this data into Alma.

Data is not transferred by Ex Libris to any third party, except as authorized or initiated by the Ex Libris customer.

7 - Risks and Controls

Data processing involves high volume activities involving a large number of people or a larger percentage of the relevant population. Yet, the sensitivity of the information collected about individuals (patrons) is low. None of the data elements are considered special category (GDPR Article 9).

Specific risks and controls:

Main Risks	Key Controls
Disclosure of individuals’ data to unauthorized party – internal users	<ul style="list-style-type: none"> - Access management controls, authentication and authorization mechanisms
Disclosure of individuals’ data to unauthorized party – external party (e.g., hackers)	<ul style="list-style-type: none"> - Application security measures - Operational security including: data center security, server security and network security - Intrusion prevention - Contractual agreements - Security monitoring
Processing of personal data without proper need	<ul style="list-style-type: none"> - Contractual agreement - Privacy by Design processes, managed by DPO, including privacy implementation in product development - Privacy assessments

Breach of individual rights	<ul style="list-style-type: none"> - Data Processing Agreement - Most individual rights are responsibility of data controller - Governance processes by DPO
The organization has not implemented a documented Privacy management framework	<ul style="list-style-type: none"> - Documented, published and implemented privacy policy - Appointed DPO, responsible for keeping the privacy processes current

8 - Privacy management framework

8.1 - GOVERNANCE

The development and implementation of the privacy framework is the responsibility of Ex Libris DPO, Ellen Amsel. This also includes involvement in product development and privacy processes implementation throughout Ex Libris.

8.2 - PRIVACY POLICY

Ex Libris privacy policy is published in: <https://www.exlibrisgroup.com/privacy-policy-1-2/> and managed by the DPO.

8.3 - SECURITY

Information security policy is clear and published in: [https://knowledge.exlibrisgroup.com/Alma/Product_Documentation/010Alma_Online_Help_\(English\)/010Getting_Started/020Security_and_Data_Privacy](https://knowledge.exlibrisgroup.com/Alma/Product_Documentation/010Alma_Online_Help_(English)/010Getting_Started/020Security_and_Data_Privacy).

Security controls include:

- Physical security
- Operational security
- Network security
- Intrusion prevention
- Application security
- Access control
- Asset management
- Backup controls
- Privacy management
- Risk management and compliance

8.4 - THIRD PARTY

Ex Libris uses data center co-location providers. Ex Libris owns and manages all the equipment in the data center and monitors the security controls over the data center vendor using SOC2 (Type 2) audit reports. Additional information can be found at the [Ex Libris Trust Center](#).

Personal data is not shared by Ex Libris with any third parties, except as authorized or initiated by the Ex Libris customer.

8.5 - USER RIGHTS

Data is collected and provided by library management - data is processed according to the data processing agreement, and individuals' consent is the responsibility of the library (the data controller).

Ex Libris provides their customers with processes and tools to allow patrons the ability to access and correct their personal data, and to delete their personal information in accordance with the library's policies. This is performed by the library staff, using the Alma interface. Any patron wishing to make a comment or complaint regarding their own information can contact the Ex Libris DPO.

8.6 - CONSENT

Consent is managed by the customer (library), who is the data controller.

8.7 - TRAINING & AWARENESS

Ex Libris is managing a privacy awareness training program, as well as a security awareness training program. Additionally, specialized Privacy by Design training has been conducted specifically for GDPR.

8.8 - INCIDENT HANDLING

Ex Libris has constructed incident response and notification procedures. Procedures are included in the [Ex Libris Security and Privacy Incident Response Policy](#) and the involvement of the DPO in case of a data breach.

8.9 - PRIVACY BY DESIGN

Ex Libris has implemented Privacy by Design processes, which involve the DPO and privacy concerns from the beginning of product development and through change management.

8.9.1 - Data minimization

The information collected by Alma (specific data elements listed above) is limited to the information necessary, relevant and proportionate to the purposes of the system use. Only personal data which is necessary for the processing is collected.

8.9.2 - Data retention

Alma allows retention of historical data, in order to support auditing needs. To reduce privacy risk, the system anonymizes historical data that is no longer needed. Specific anonymization rules (for loans, fees and fines) are detailed in Alma Data Privacy FAQs.

Alma allows libraries to delete historical data, when this is not needed, in order to implement their own data retention policies.

9 - Record of Changes

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Approved by:	Ellen Amsel, Privacy and Regulation Officer & DPO
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Reviewed & Revised:	Tomer Shemesh

9.1 - Revision Control

Version Number	Nature of Change	Date Approved
1.0	Initial version	Oct 16 ,2018
2.0	Reviewed and updated	March 15, 2020
2.1	Updated Section 6.2, Data Flows	August 16, 2020