Privacy Policy of the Klub Koloseum Association's Lending desk

This privacy policy applies to personal data collected and used by the Klub Koloseum Association, 65 Legnicka Street, 54-206 Wrocław to achieve statutory goals, and in particular to ensure the operation of the Lending desk during its own events and those of other organizers.

Lending means that the Association allows event participants to use the resources of its library. When the Borrower takes something from the library, he or she agrees with the Association that he or she will use and enjoy the item taken, and that he or she will return it to the Lending desk in a non-deteriorated condition and within a specified time. The rules that the Association agrees with the Borrowers are included in the Statute of the Lending desk.

Items available at the Lending desk are nothing else than the assets of the Association or those entrusted to it by its partners. When their condition deteriorates or further lending becomes impossible, the Association will suffer a loss or will be obliged to compensate its partners for the damage. However, if deterioration occurs during the period of lending, the Association will expect the Borrower to repair the damage. However, for this to be possible, it must be known to whom, when and what was borrowed. For this purpose, personal data is collected and used.

Currently, personal data is protected in accordance with the General Data Protection Regulation (GDPR), which entered into force in May 2018. Does the Association have the right to collect and use personal data of Borrowers?

The Association collects and uses two categories of data:

1) personal data of the Borrowers,
2) statistics of lendings.

Personal data of the Borrowers is collected on a paper form completed by the person willing to use the Lending Service before the first borrowing. On their basis, the Association issues an identification card, which, when presented, allows access to the Lending Library's collections and may use it to process data of lendings for statistical purposes.

The Association does this to know to **whom** it has made items from its Library available and thus be able to protect its own and its partners' assets.
Completed forms are stored in a chaotic and disorderly manner, and access to them is limited. It is held by members of the Association's authorities and a few persons authorized by them for a specific purpose (e.g. considering a complaint, resolving a legal dispute).
The chaotic and disorderly nature of the collection means that the personal data of the Borrowers does not constitute a collection of data within the meaning of the GDPR. Therefore (in accordance with Article 2 point 1 of the Regulation) the GDPR does not apply to their processing.

Lending data can be collected and used by the Association in a completely non-automated way (e.g. on a so-called 'notebook') or in a completely computerized way (e.g. using a computer system).
The Association's aim in this case is to know **to whom, what has been lent and at what time**, which data is necessary to perform what the Association has agreed with the Borrower.
The use of identification cards here introduces a mechanism to protect the personal data of the Borrowers. With these cards, the rental data is subject - as the GDPR defines it - to pseudonymisation. In other words, additional knowledge is required in order to be able to attribute a lend to specific personal data. The Association has such knowledge - albeit technically and organisationally limited - at its disposal, as it is contained in the separately stored personal data of the Borrowers.
As a result of pseudonymisation and technical and organizational limitations, the impossibility to attribute the person to whom the lending data relates means that it does not constitute a dataset in the sense of the **GDPR** . And thus (in accordance with Article 2, point 1. of the Regulation) the **GDPR** does not apply to their processing.

However, the Association is taking steps to change the above-described state of affairs. It is assumed that when these come to fruition, the hitherto collected personal data of the Borrowers (provided there are no unsatisfied claims involved) will be forgotten, a new Privacy Policy will be developed, according to which the personal data will be collected again.
If you have any questions or concerns regarding your personal data, please contact us by e-mail at: zarzad@klubkoloseum.org.pl.