

# British Toy & Hobby Association

## Data Privacy Impact Assessment

www.btha.co.uk

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### Submitting controller details

Name of controller	British Toy & Hobby Association
Subject/title of DPO	Head of Digital & Toy Trust Services
Name of controller contact /DPO	Matt@btha.co.uk

### Identifying the need for a DPIA

We have carried out this Data Privacy Impact Assessment as required legally by the Age-Appropriate Design Code. The British Toy & Hobby Association, by its name and nature may appear via online search results, industry-related news or other online references to toys, games and hobbies. Results may appear before a younger audience than for which it was designed (the British Toy & Hobby Association website is an industry, trade-only website by default).

This website contains business content /stories and not “fun” toy content and it is therefore believed not to be of interest to children.

# Data Processing

## The nature of our data processing:

If you are a BTHA supplier or business partner, we collect and store your name, contact details and job title in order to manage our business relationship with you.

As part of our communications and public affairs activities, we liaise with Members of Parliament, regulators, trading standard authorities, academic and journalists. Where we liaise with you in such capacity, we will retain your personal information, such as your name and contact details, in order to manage the relationship with you, obtain advice from you as well as share opinions.

Your personal information will only be used for the purpose stated above and will be processed in accordance with this privacy policy.

### Information you provide when you contact us

We collect personal information when you contact us online, by phone or by post in relation to a query or a complaint. This information will include your name, phone number, any personal information in or relevant to the resolution of your enquiry or complaint.

We will use your personal information to answer your queries, handle your complaints and fulfil any requests you make to us.

## Describing the scope of our processing:

We collect information where:

- An individual registers with or uses one of the websites or BTHA applications set out below:

- our main website (btha.co.uk);
- our Toy Fair website (toyfair.co.uk);
- our Make Time 2 Play website (maketime2play.co.uk); or
- our Make Time 2 Play mobile application

(together “**BTHA website users**”)

- are registered as a BTHA Member
- are a Toy Fair Exhibitor
- are a Toy Fair Visitor
- are a BTHA supplier, partner or engage with us through other offline methods e.g. as a politician, a journalist or a member of the public.

(collectively “**you**”).

## Describing the context of our processing:

### **Personal information we collect and use if you are a BTHA website user**

#### Our websites use cookies

When you use our websites, certain limited information, such as your browser type, your device type (e.g. iPhone or Android etc.), your IP address, your search requests, will be collected automatically using cookies and other technologies. A cookie is a small text file containing small amounts of information which is downloaded to / stored on your computer (or other internet enabled devices, such as a smartphone or tablet) when you visit a website.

Cookies will sometimes collect personal information about you. Cookies help us remember information about your visit to our websites, like your country, language and other settings. Cookies allow us to understand who has seen which webpages, to determine how frequently particular pages are visited and to determine the most popular areas of our websites. We use the information collected by cookies to improve your browsing experience as well as how our websites operate. For example, we will retain and evaluate information on your visits to our websites and how you navigate the different sections of our websites for analytics purposes. This helps us understand how our websites are used so we can make them more intuitive. We will normally do this by using anonymised or aggregated datasets. For more information about how our cookies work and how to manage your cookie settings please visit our [Cookie Policy](#).

*Please note that our Make Time 2 Play app is a parent-only app that provides play ideas for children. It only collects information about the type of device you use to access the app. It does not use cookies or other tracking technologies to collect any other personal information. You will know where our website or app uses cookies or tracking technologies as we will always display a cookie banner on the website or the app.*

#### **Information you provide on our websites**

We also collect personal information which you complete an online form on our websites or where you create your BTHA Members account, such as your name, your address, phone number, your preferences, your username and password etc. You would typically provide this information when you create an account on our websites. We will use the information you provide to create your BTHA Members account or to register you as a Toy Fair Exhibitor or Toy Fair Visitor and to enable the websites remember your details whenever you visit the websites, so you do not have to always re-enter the information.

### **Personal information we collect and use if you are a BTHA supplier, partner or engage with us through other offline methods e.g. as a politician, a journalist or a member of the public**

If you are a BTHA supplier or business partner, we collect and store your name, contact details and job title in order to manage our business relationship with you.

As part of our communications and public affairs activities, we liaise with Members of Parliament, regulators, trading standard authorities, academic and journalists. Where we liaise with you in such capacity, we will retain your personal information, such as your name and contact details, in order to manage the relationship with you, obtain advice from you as well as share opinions.

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### **Children**

We do not knowingly collect information from children. Our website is targeted at adults, and on-line registration is restricted to adults who are professionally engaged in the businesses we serve. The exception to this rule occurs when details are taken about children who are involved directly with the press and demonstrations at Toy Fair. On these occasions the details are taken to ensure the BTHA knows which children are working onsite at the Toy Fair. These details are deleted following the Toy Fair, except as otherwise provided in this privacy policy.

If you are under 18, you may not use our websites, our services, or provide any information to our websites without involvement of a parent or a guardian. We do not knowingly collect information from, and/or about children without the involvement of a parent or a guardian.

## Step 5: Risk Assessment

Describe source of risk and nature of potential impact on individuals.	Options to reduce or eliminate risk	Likelihood of harm	Severity of harm	Overall risk
Data breach	The BTHA website adheres to the highest standards of data protection and security. No personal data is collected via the BTHA website.	Possible	Severe	Low
Subjects not expecting their data to be processed in this way	Clear privacy notices, with adult site users engaged and informed. Privacy notice provides clear pathways to opt out, contact the BTHA for access to personal data or further information.	Possible	Significant	Low
The website not being used for the intended purpose	The BTHA website contains business stories with minimal reference to specific products which may be of interest to children.	Remote	Minimal	Low

## Step 7: DPIA Sign off

Item	Name/position/date	Notes
Measures approved by:	<b>Matthew Jones</b> <b>Head of Digital</b>	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	<b>Matthew Jones</b> <b>Head of Digital</b>	If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:	<b>Matthew Jones</b> <b>Head of Digital</b>	DPO should advise on compliance and whether processing can proceed
<p>Summary of DPO advice:</p> <p>This website is deemed to be a business site which contains business content /stories and not “fun” toy content. It is therefore deemed to not be of interest to children.</p>		
DPO advice accepted or overruled by:	n/a	If overruled, you must explain your reasons
<p>Comments:</p>		
Consultation responses reviewed by:	n/a	If your decision departs from individuals’ views, you must explain your reasons
<p>Comments:</p>		
This DPIA will kept under review by:	<b>Matthew Jones</b> <b>Head of Digital</b>	The DPO should also review ongoing compliance with DPIA