

# British Toy & Hobby Association

## Data Privacy Impact Assessment

[www.maketime2play.co.uk](http://www.maketime2play.co.uk)

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### Submitting controller details

Name of controller	Matthew Jones
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. Make Time 2 Play, 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 Toy Fair 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 visitor to the Make Time 2 Play website and contact us, we collect and store your name and basic contact details in order to manage our business relationship with you.

Your personal information will only be used for the purpose stated above and will be processed in accordance with our 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:

Ordinarily, 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**”).

**Social media competitions**

From time to time, we will organise competitions on our social media pages (including, but not limited to LinkedIn, Twitter and Youtube). We use the personal information you provide, such as your name, email address and postal address, to organise these competitions and for the purpose of administering the prizes to the competition winners.

**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. Include associated compliance and corporate risks as necessary.	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