

# British Toy & Hobby Association

## Data Privacy Impact Assessment

www.toyfair.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 Toy Fair, 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 an exhibitor at or a visitor to London Toy Fair, we collect and store your name, contact details and job title 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 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 Toy Fair Exhibitor**

Where you apply to exhibit your products at a Toy Fair exhibition, we will collect personal information relating to you as an individual, if you are an individual exhibitor. If you are applying on behalf of a company, we will collect personal information about you and your company. Such information will include:

- your name;
- your company name
- if you are a BTHA Member or not;
- your contact information, such as your email address, telephone number, job title;
- invoicing contact information, where this is different from your normal contact information;
- other payment information;

Please note that we collect personal information about you where this is provided by your employer. For example, where a company provides us information about its health and safety officer. We will collect the name and contact details of the health and safety officer.

We require this information in order to enter into an agreement with you (i.e. the exhibition terms and conditions) and provide you with services relevant to Toy Fair Exhibition. For example, we need to put you in contact with our service providers who provide you with your stand option, we would need to liaise with your designated health and safety officer and/or other members within your organisation who will be managing your company's presence at the exhibition.

Please note that we will share your personal information with our core service provider, Global Experience Specialist (GES) Ltd who provide essential services for the Toy Fair Exhibition. GES is a company registered in England and Wales, (company number 02930892), whose registered office is at Silverstone Drive, Gallagher Business Park, Coventry, CV6 6PA.

GES provides our stand packages and may also market separate GES services to you. In carrying out non-exhibit related marketing activities, GES will be a data controller. We would therefore encourage you to review GES's privacy policy in relation to its handling of your personal information.

We will also provide your information to the following entities who also provide essential services for the exhibition.:

Abraxys Ltd – exhibitor data

Agility Logistics Ltd – exhibitor data

GES Ltd – exhibitor data

Reference Technology Ltd – exhibitor and visitor data

Bastion Ltd – exhibitor and visitor (media) data

We will inform you before providing your personal information to these entities, thereby giving you an opportunity to choose which services you require and which services providers to share your personal information with.

### **Personal information we collect and use if you are a Toy Fair Visitor**

By registering as a visitor for a Toy Fair exhibition, we will collect personal information such as your name, job title, company name, physical mailing address, e-mail address, telephone and fax numbers. We will use these details to send you information, (mostly by email) regarding arrangements for the

Toy Fair exhibition and other Toy Fair related issues. Where you have indicated that we contact you with such information, we will use these details to tell you about BTHA information, events, related services and toy industry information.

If you provide us with personal information about another individual, e.g. a colleague or associate's details, we expect you to ensure that they know you are doing so and are happy with their information being provided to BTHA. The information will be used in accordance with this privacy policy so please encourage them to read this policy to find out more about what we do with their personal information

### **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
<p>Data breach</p> <p>Subjects not expecting their data to be processed in this way</p> <p>The website not being used for the intended purpose</p>	<p>The BTHA website adheres to the highest standards of data protection and security. No personal data is collected via the BTHA website.</p> <p>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.</p> <p>The BTHA website contains business stories with minimal reference to specific products which may be of interest to children.</p>	<p>Possible</p> <p>Possible</p> <p>Remote</p>	<p>Severe</p> <p>Significant</p> <p>Minimal</p>	<p>Low</p> <p>Low</p> <p>Low</p>

## 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