Examples	Analysis
Explicit special category data	
✓ An environmentalist organization wants to target members of a specific political party. A social media user explicitly states in her profile that she is a member of that party.	This constitutes processing of special category of personal data (political opinions) which can be justified with the users' explicit consent or on the basis that the data has been manifestly made public by the user.
Inferred/combined special category data	
✗ A social media user states that they have visited a place which is typically visited by people of certain religious beliefs.	A mere statement that a user has been to a place typically visited by people of certain religious beliefs would not generally and of itself be considered special category data; however, it may be deemed as such, if combined with other data or if the context in which or the purpose for which it is processed justifies so.
✓ A social media user makes a status update that he has attended a religious service at the City Church. The City Church then wants to target its visitors with religious messages.	
✗ A social media user's activity (status updates, check-ins, etc.) indicates that he has a certain philosophical belief.	The mere fact that a social media provider processes a large amount of data which could potentially be used to infer special category data does not automatically mean that such data fall under Art. 9 GDPR. If the provider does not infer special category data and takes measures to prevent such data from being inferred or used for targeting, Art. 9 will not be triggered.
✓ A social media provider combines information actively provided by a user on her profile about her age, interests and address, with observed data about her browsing activity and her "likes". From this information, the provider categorises her as "*interested in left-wing liberal politics*" and makes this targeting criterion available to targeters.	The use of this targeting category amounts to processing Art. 9 data irrespective of whether or not such categorization is accurate/true.
✓ A social media user takes a career aptitude test available on the social media platform through a third party "YourPerfectJobs" which also collects data about the user's education, employment status, age, hobbies, posts, email addresses and connections. YourPerfectJobs uses this information to infer personality traits, psychological profile and political beliefs, then targets the user on behalf of a political party using the standard custom audience feature of the social media provider (email matching) without adding any other targeting criteria.	In this example, the targeter processes special category data, whereas the social media provider does not. The EDPB points out that the provider is nevertheless responsible for integrating safeguards in order to meets its accountability and privacy by design and by default requirements.

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