

Within the University's processes, there may be instances where, in order to enable the University to consider your complaint, we may need to process information about you which you have disclosed to us which falls under 'Special Category' Personal Data. 'Special Category' Personal Data is defined under the General Data Protection Regulation (GDPR) as the personal data about the following –

- Race;
- Ethnic Origin;
- Politics;
- Religion;
- Trade Union Membership;
- Genetics;
- Biometrics (where used for ID purposes);
- Health;
- Sex Life; or
- Sexual Orientation

Where the University processes Special Category Data, we are required by the General Data Protection Regulation to have a legal basis for why we need to process this data. The table below explains the legal basis for processing your data in relation to a complaint.

Special Category Data	Legal Basis	Union or Member State Law
Race	GDPR Article 9, s.7 - processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject	Equality Act (2010)
Ethnic Origin	GDPR Article 9, s.7 - processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject	Equality Act (2010)

Politics	GDPR Article 9, s.7 - processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject	Equality Act (2010)
Religion	GDPR Article 9, s.7 - processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject	Equality Act (2010)
Trade Union Membership	GDPR Article 9, s.7 - processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject	Trade Union and Labour Relations (Consolidation) Act 1992
Genetics	GDPR Article 9, s.7 - processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the	Equality Act (2010)

	fundamental rights and the interests of the data subject	
Biometrics (where used for ID purposes)	The University does not process biometric data for identification purposes.	N/A
Health	GDPR Article 9, s.8 – processing is necessary for the purpose of preventative or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care of treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred	Equality Act (2010)
Sex Life	GDPR Article 9, s.7 - processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject	Human Rights Act (1998)
Sexual Orientation	GDPR Article 9, s.7 - processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject	Equality Act (2010)