POLICY FOR THE CREATION OF NEW FBK WEBSITES (PROJECTS, EVENTS)

REV AND DATE	DRAFTING	REVIEW	APPROVAL	CHANGES TO PREVIOUS VERSION
Rev. 02 of 20/06//2025	Communication and external relations Unit	Digital Solutions and IT Infrastructures Service, Corruption Prevention, Transparency and Privacy Unit	Communication and External Relations Unit with resolution no. 09/25 of June 20, 2025	Section 2." Event/project websites and announcement of research initiatives Section 5 "Request for support in the management and monitoring of existing websites" Section 7 "Personal data protection"
Rev. 01 of 11/02/2021	Digital Communication and Big Events Unit	Corruption Prevention, Transparency and Privacy Unit	Digital Communication and Big Events Unit with resolution no. 02/21 of November 2, 2021	Section 5. "Request for support in the management and monitoring of existing websites." Section 6. "Content management and site maintenance"
Rev. 00 of 03/12/2021	Digital Communication and Big Events Unit	Corruption Prevention, Transparency and Privacy Unit	Digital Communication and Big Events Unit with resolution no. 02/21 of March 12, 2021	Adoption

1. Introduction

The Communication and External Relations Unit supports the external communication of the FBK brand, its main research activities, and the results achieved by the Foundation, contributing to their promotion through methods and tools suited to communication needs;

Within this framework, the Communication and External Relations Unit supports the identification of the most effective methods for publishing content of public interest online. This includes proposing one or more communication strategies based on an analysis process and the development of a content map aligned with communication goals and the target audience.

The Communication and External Relations Unit's main communication channels are the institutional website - www.fbk.eu - and the Magazine - magazine.fbk.eu.

The institutional website and the Magazine are managed directly by the Communication and External Relations Unit, which is also charged with coordinating the image of the Foundation's brand between the Center institutional sites and the other sites of the fbk.eu domain.

2. Event/project websites and announcement of research initiatives

The Communication and External Relations Unit supports, upon request, the process of creating new websites for Fondazione Bruno Kessler's activities related research events or projects, assessing, with the organizers, the method and tool to be used as well as the content maps based on the principles of autonomy, accountability and flexibility.

Regarding project sites, events and specific research initiatives promoted by the Centers, standard tools used according to a procedure integrated with the Digital Solutions and IT Infrastructure Service are supported by GOOGLE - NEW GOOGLE SITE platform.

Domain names must be approved by the IT Service prior to the creation and publication of websites. Google sites support only second-level domain names "eventname.fbk.eu" or "projectname.fbk.eu".

Specific indications will be followed when mentioning entities and logos in the case of events or projects funded by entities other than the Foundation. The sites must also include links to the Google privacy and cookie policies as well as to other policies on privacy depending on the events and projects concerned and on the processing of personal data.

Requests to use web platforms other than Google for project websites, event pages, or other research-related initiatives must be supported by a clear justification based on specific needs (e.g., advanced graphics, multilingual functionality, personalized domain name, availability of a dedicated budget, etc.). Each request will be reviewed on a case-by-case basis by the Communication and External Relations Unit, in consultation with the Secretary General and the IT Service, particularly in regard to the possible activation of external services or procurement of third-party solutions. If the request is approved, the Communication and External Relations Unit will provide support, following methods and a timeline to be defined in alignment with the internal planning calendar. In general, for requests involving platforms other than Google, users will be directed to an institutional cloud platform or a comparable service provider—such as WPENGINE—that offers similar services and complies with relevant regulations, including GDPR." In-house installations, instead, are not permitted. This

external platform service requires that a fee be paid by the customer and may also be associated with a domain name that is different and independent from fbk.eu.

3. Request procedure

The support request can be sent via e-mail to web@fbk.eu.

Requests for the creation of a new website should contain the following details:

- the purpose for which the website is being requested;
- the purpose of the website;
- the target audience (for example "website for a research project, for events", specifying the type of event, etc.)
- a suggestion for a relevant domain name based on the "domainname.fbk.eu" pattern.

To request the inclusion of events on the website www.fbk.eu or to publicize initiatives, awards, or special projects of institutional relevance, the dedicated "Segnala una news" (Publicize news) form available in the my.fbk.eu APP (and directly at this [link]) should be used.

4. Request processing times

Requests should be submitted well in advance to allow sufficient time for website preparation and publication, taking into account the complexity and volume of content required. For websites managed through Google Sites, a minimum notice period of 14 working days is required.

In the event that also graphic support is needed for the creation of a project logo or other graphic material, the required advance notice is at least 20 working days.

Request	Processing time days	Notes
New event/project/initiative site with Google Site	14 days	To create the site and associate a dns to it with the IT service
New project / event / initiative site on platforms other than Google site	30 days	Consultancy on the selection of external platform and organization of text and graphic contents

5. Request for support in the management and monitoring of existing websites

The Communication and External Relations Unit provides support with the management of institutional sites developed on the Wordpress platform and the sites of special projects relating to the activities of the Foundation created on the Google Site platform.

Requests for assistance with website structure and user management should be submitted using the procedures outlined in point *3. Request procedure.*

Website monitoring must strictly adhere to the principles of necessity and data minimization, as outlined in Article 5 of the GDPR. It will be implemented exclusively for project websites that require monitoring for reporting purposes, using services compatible with the selected hosting provider—whether free or paid—provided they are fully GDPR-compliant.

6. Content management and website maintenance

- For each new website created by the Communication and External Relations Unit, two key roles must be identified: an internal administrator from the Communication and External Relations Unit and a content manager, who must be identified for each project or event site and listed on the website upon publication.
- The use of images and photographs must strictly comply with the guidelines outlined in the document titled Policy for the Use of Images.
- The creation and publication of social media channels or event websites must adhere to the internal guidelines for the use of social media connected to Fondazione Bruno Kessler.

All websites developed and supported by the Communication and External Relations Unit are guaranteed hosting for five years. After this period, continued hosting and maintenance on the current platform are not assured unless specific requests and requirements are communicated in advance.

7. Personal data protection

Event and project websites must first clarify FBK's role in the processing of personal data (Data Controller or Data Processor based on the activities and consequent responsibilities defined in the agreements with partners in the case of research projects).

The link to the Foundation's Privacy and Cookie Policy must be included on all event websites. Additionally, if FBK is responsible for organizing and managing event registrations, a privacy notice must also be provided, including a link to the Information rwgarding the processing of personal data of event participants.

On project websites, a link to the project-specific Privacy and Cookie Policy must be provided. This policy should be tailored to reflect the specific types of personal data collected, the hosting service used, and the software implemented. Specific information on cookies can be found in the Privacy Protection Authority's website at the link https://www.garanteprivacy.it/faq/cookie

Wherever the site offers services that involve the collection of personal data (such as contact forms, request submissions, newsletter subscriptions, etc.), a brief notice regarding the data processing must be provided, along with a link to the full Privacy and Cookie Policy. Users must check a box confirming they have read and understood the information provided and must be able to give explicit consent for specific types of data

processing. If the personal data of project or event participants is to be published, their explicit consent must first be obtained for its disclosure to the relevant parties.

Always keep in mind that personal data may be downloaded by *web scrapers* or *web crawlers*. Although FBK has implemented various technical and procedural safeguards to mitigate the risk of web scraping, it cannot be entirely eliminated Therefore, it is important to carefully consider whether sharing personal data is truly necessary before publishing it.

Useful templates are available on the HowTo website at https://howto.fbk.eu/documenti/templates-e-materiali-utili-privacy/.