
 FONDAZIONE BRUNO KESSLER	<b>Web Policy: new Center and Unit websites</b>	LGP 7.4_1Rev. 02 of 20/06/2025  <b>PUBLIC</b>
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# **WEB POLICY:** **NEW CENTER AND UNIT SITES**

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 1 a "Guidelines for the presentation of Center websites" / b, section 2 "Contents and external communication", section 4. "Access monitoring", section 6. Organization  Additions to art. 5 - 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 1 a "Guidelines for the presentation of Center websites" / b, section 2 "Contents and external communication"
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

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## 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. The **institutional and official web** communication channels are the **Institutional Website** [www.fbk.eu](http://www.fbk.eu) and the **Magazine** [magazine.fbk.eu](http://magazine.fbk.eu).

These tools serve as the official channels for information, external communication, and promotion, and should be used to convey all strategic content that supports the Foundation's credibility, positioning, and public image.

"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.

### 1. Center and Unit websites


With the Foundation's new organizational structure, how the Centers are presented on the website becomes crucial and requires ongoing evaluation and dialogue with the teams responsible for communication and marketing strategy.

#### a. Guidelines for Presenting FBK Centers Online

Research Centers will prepare their presentations in accordance with the current communication strategy, as agreed with Top Management and Center Directors, [ensuring](#) that strategically relevant information is included on the Foundation's **Institutional Site**, tailored to the target audience and the specific period in question.

Individual Research Centers may still create their own website as a Center, ensuring adherence to strategic guidelines and respecting the principles of autonomy, accountability and flexibility. The Center sites may also be hosted on external platforms, provided they comply with state-of-the-art standards for reliability and security, and fully adhere to principles of privacy and personal data protection, as mandated by current legislation and the guidelines of the relevant authorities (e.g., the Data Protection Authority). The service provider must process data on EU territory and ensure that it is "GDPR compliant". When choosing the platform and the software or CMS for developing the site, it is important to consider the potential future integration of the DNS. This should be evaluated in advance for feasibility and security, in coordination with the internal FBK contact responsible for DNS management (IT Service). The Center's website also ensures that it develops an appropriate degree of uniformity in graphic style and communication through:

- the inclusion of the **Foundation's institutional logo** as a symbol of brand and institutional affiliation. The FBK logo should be prominently displayed on all pages, preferably in the top-left corner, and should link to the FBK homepage at [www.fbk.eu](http://www.fbk.eu). The logo must be clearly visible and linked to the FBK homepage across all device views, including tablets and mobile. If it does not appear in the header, it must be included within the body content or in the main navigation menu, ensuring it remains linked to the foundation's homepage ([www.fbk.eu](http://www.fbk.eu));

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- The supervision by the Communication and External Relations Unit of the graphic style—ensuring it remains consistent with the institutional website **www.fbk.eu**—and oversee the information structure, particularly the menu items and navigation layout, to maintain alignment with the Foundation’s overall guidelines;
- including in the Center's home page **a sentence that presents the Center as part of the Foundation ("In line with the mission of FBK, which aims to achieve results of scientific excellence and to produce an impact on society, the center...")**;
- The identification of domain names must be agreed upon before the creation of the sites themselves, in coordination with the IT service and the web team of the Communication and External Relations Unit, to ensure uniformity and coordination in DNS management. The **apex domain 'fbk.eu' is not permitted**; only subdomains such as, [.<center>.fbk.eu](http://<center>.fbk.eu) ' are allowed.
- the inclusion of the following sentence among the credits: *"This publication was made possible with the support of the Autonomous Province of Trento. The use of content protected by intellectual property rights is conducted in accordance with the provisions of Articles 2, 21, and 33 of the Constitution, as well as Article 70 of the Copyright Law."*


## Unit websites

### b. Guidelines for the web presentation of the Research Units

Research Units within the Foundation’s Research Centers will adhere to the presentation guidelines aligned with the current communication strategy, as agreed upon by Top Management and the Center Directors, ensuring that all strategically important information relevant to the target audience is included.

In all cases, each Unit—similarly to each Center—may create its own website as a Unit, provided it clearly states its affiliation with the corresponding Center and the Foundation, in accordance with the following guidelines:

- include the **Foundation's institutional logo** as a symbol of brand and institutional affiliation. The FBK logo must appear in the header and be always visible while browsing all pages, possibly in the top left corner, and must link the page with the FBK home page [www.fbk.eu](http://www.fbk.eu). The logo must be visible and linked to the FBK home page also for tablet and mobile device views; if it does not appear in the header, it must be placed in the body of the page, among the contents or in the main navigation menu, and linked to the foundation's home page;
- The **Unit logo** can be placed, in addition to on the home page, in the header next to or on the opposite side of the Foundation's logo or, alternatively, in the text body on the home page. The FBK logo should be included but visually distinct and clearly separated from the unit logo.
- including in the Unit's home page **a sentence that introduces the Unit as part of the Center of affiliation and of the Foundation ("in line with the mission of FBK, which aims to achieve results of scientific excellence and to produce societal impact, the ... Center's ...Unit")**;
- the inclusion of the following sentence among the credits: *"This publication was made possible with the support of the Autonomous Province of Trento. The use of content protected by intellectual property rights is conducted in accordance with the provisions of Articles 2, 21, and 33 of the Constitution, as well as Article 70 of the Copyright Law."*
- sharing the graphic style with the Communication and External Relations Unit—ensuring it closely aligns with the [fbk.eu](http://fbk.eu) portal's design—as well as the information structure, particularly the menu items and navigation layout, to enable supervision of consistency with the Foundation’s overall guidelines;


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- The domain names must be approved prior to site creation, in coordination with the IT department and the Communication and External Relations Unit, to ensure uniformity and effective management of DNS. The **apex domain 'fbk.eu' is not permitted**; only *subdomains* such as *.fbk.eu* ' are allowed;
- When choosing the platform and the software or CMS for developing the site, it is important to consider the potential future integration of the DNS. This should be evaluated in advance for feasibility and security, in coordination with the internal FBK contact responsible for DNS management (IT Service). In case the Unit site is hosted on external provider, in PaaS or SaaS mode, in order to associate a domain name <unit>.fbk.eu with it, the provider must provide for the ability to associate domain names via CNAME or ALIAS. For IaaS, the use of a public IP address is permitted. In any case, third-level domains such as: <unit>.<center>.fbk.eu are not permitted. The provider must process data on EU territory and be compliant with the GDPR (General Data Protection Regulation).
- For all websites created and supported by the Unit, hosting and domain name services are provided for a period of five years. After this period, continued hosting and maintenance on the current platform will no longer be supported, unless specific requests or needs have been explicitly communicated and approved in advance.

Research Units may also be presented on the Center site, with all the information deemed strategic by top management and Governance.

## 2. Contents and external communication

- **Institutional information, media communication, and the external promotion of activities related to the Research Centers and Units are managed exclusively through the Foundation's official web channels — www.fbk.eu and magazine.fbk.eu. To ensure these channels are kept up to date, timely communication with the Communication and External Relations Unit is required.**
- With regard to content, Unit and Center websites must adhere to principles of transparency and accuracy, ensuring the publication of relevant, precise, up-to-date, and truthful information about their people, projects, and activities.  
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 from the requesting Research Center, designated by its Director. These individuals must be assigned for every project or event site and listed on the website upon publication. Website editors are responsible for the content published and the changes made.
- All situations must comply with the guidelines outlined in the Foundation's [Code of Conduct](#)."
- 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](#).

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### 3. Accessibility

Center and Unit sites must comply as much as possible with accessibility guidelines as set out in particular within the **W3C Web Accessibility Initiative** (WAI - <https://www.w3.org/WAI/>) in accordance with the updated current regulations that have implemented European Directive 2016/2102.

The Foundation has set concrete goals for improving the accessibility of sites by publishing the guidelines pursued annually on the website [trasparenza.fbk.eu](https://trasparenza.fbk.eu), in the section on Accessibility.

### 4. Access monitoring

Website monitoring may be carried out based on the specific needs of each Center, and always in compliance with current data protection laws.

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.

In the event that the Center sites are hosted on institutional hosting, the Matomo software integrated with Wordpress will be used for web access monitoring.

### 5. Personal data protection

The Foundation's [Privacy and Cookie Policy](#) link must be included on all Center and Unit websites, with any necessary adjustments reflecting the hosting service, software used, and the specific personal data processing activities conducted. Specific information on cookies can be found in the Privacy Protection Authority's website at the link <https://www.garanteprivacy.it/faq/cookie>. Useful templates are available on the HowTo website at <https://howto.fbk.eu/documenti/templates-e-materiali-utili-privacy/>.


When services involve the collection of personal data (such as through request or communication forms), a brief notice regarding the processing of the collected data must be provided, along with a link to the full privacy policy. Users entering their personal data must tick a box in which they declare they have read and understood the information and must be able to give their consent for specific processing.

As for the contents, Unit and Center sites may contain the names and FBK telephone numbers for their staff members.

If additional personal data of staff members (such as photos, CVs, etc.) is to be published, consent must be obtained from the individuals concerned using the Foundation's established methods and tools.

When publishing CVs, the Foundation protects its staff by removing from the document any unnecessary personal data (photo, place and date of birth, taxpayer code, address and personal contact details, signatures ...) and any sensitive data (nationality, disability status, religious or philosophical beliefs, political opinions, party or trade union membership, affiliation to religious, philosophical, political or trade union associations or organizations).

Given the risk that personal data may be accessed by *web scrapers* or *web crawlers*, the Foundation has implemented technical and procedural measures to mitigate this risk. However, it is not possible to guarantee complete prevention of

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*web scraping*. It is essential to be aware of this risk and exercise caution before publishing any personal data on the website, ensuring that such publication is truly necessary.

## 6. Organization

Whether requesting internal support from the Communication and External Relations Unit or opting for stand-alone or external platform implementation of websites, requests for Center or Unit sites and their proposed domain names (DNS) must be sent for preliminary approval to [web@fbk.eu](mailto:web@fbk.eu) and in copy to the Center Director.