



Base4NFDI Website Policy

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Version 1

This document

This document explains what support Base4NFDI can provide to funded basic service teams regarding their websites and what is - on the other hand - in their own responsibility. It further sets responsibilities, provides templates, lists mandatory or optional requirements regarding domains, structure, design, and consults on imprint and privacy policies. A privacy policy template will be sent to basic service teams separately. Note, that Base4NFDI does **not** offer legally binding advice. For all aspects mentioned in this document, any questions, or requests, please contact the team via base4nfdi-office@lists.nfdi.de.

1. Goals and expectations

- Base4NFDI expects the services to have individual web pages/presences that will eventually be linked to the Base4NFDI offerings and vice versa.
- The landing pages of the services should be the central gate to everything that the services consist of and forward to, such as applications, documentation, events, news, etc. It is expected for each service to have such a landing page.
- Base4NFDI's goal is for the services' individual web presences and respective domains to have a structure, logic, and design that is recognizable and on-brand with Base4NFDI, summarised in this policy document.

2. What Base4NFDI provides

- Base4NFDI operates a high-level project presence for each funded basic service project under development under <https://base4nfdi.de/projects>. Each page has limited content (goals, team, events, publication). Teams are free to send updates to the [Base4NFDI office](#). However, as mentioned above, the creation of a separate, individual basic service website is necessary for the future Base4NFDI service portfolio. In this instance, service teams can manage structured content, have freedom for how to advertise their service, have subdomains for service functionalities (APIs, apps), and have sufficient real estate for documentation, outreach, help desk, events, etc.
- Base4NFDI provides a repository under the GitHub [Base4NFDI organisation](#) for

each service upon request. This repository may be used by the service teams for website hosting via GitHub pages and/or other content in accordance with the [GitHub terms](#).

- Base4NFDI provides two domains per service per default and offers specific or development subdomains upon request (see [section 3](#)).
- Base4NFDI provides web templates for GitHub Pages (HuGo, MkDocs, see [section 5](#)).
- Base4NFDI provides consultation (meetings) on setup and adjustments of GitHub Pages templates, on imprint/privacy policies, and design for web presences.
- Base4NFDI provides support for setting up web pages, templates, and domains, but does not provide a full web page instalment.

3. Domains

- Two subdomains per service are provided per default and follow the logic [servicename].services.base4nfdi.de. Example set:
 - ts.services.base4nfdi.de
 - terminology.services.base4nfdi.de
- Prerequisite is that the service teams provide public IP addresses for the domains and valid SSL certificates on respective servers.
- If a basic service team already has existing domain names, they need to make sure to add the domain names following the Base4NFDI domain name logic as a new `CNAME` (or vice versa). The teams are advised to get in touch with Base4NFDI for the domain name before setting the new `CNAME`.
- Further specific subdomains for the services can be provided upon request if the application/service is in production. Example: [endpoint].[servicename].services.base4nfdi.de, once 'endpoint' is ready/in production.
- For development or testing purposes, wildcard domains such as *.dev.[servicename].services.base4nfdi.de can be provided upon request.

4. GitHub/GitLab

- If a service team has a separate GitHub/GitLab organisation or repository, it is required to include the imprint and the DFG grant number in either the repository README.md file or in the header section.

5. Templates for project web pages

- Service teams are free to choose a web host for their service's web presence, i.e. GitHub, GitLab, or their own server. As a support offer, Base4NFDI hosts templates on GitHub for voluntary use.
- Service teams are free to choose a backend, i.e. a content management system (CMS) or a static site generator. As a support offer, Base4NFDI provides HuGo and MkDocs templates for GitHub pages. Service Teams may choose a backend and create a web page using one of the templates.
- GitHub: Please refer to [Appendix I](#) to follow instructions a custom domain name exists already and GitHub pages should be set up.
- If service teams do not use the Base4NFDI template(s), **extra attention needs to be paid** to the [design and structure \(section 6\)](#).
- Templates:
 - [HuGo](#)
 - Mkdocs (in progress)

6. General structure and design of the project web pages

Base4NFDI recommends the following elements and navigation structure (see [HuGo template](#) for visualisation) that can be adjusted to the service's needs:

Element	Recommended structure	Mandatory
Landing Page <i>...is the central gate to everything that the services consist of and forward to, such as applications, documentation, events, news, etc.</i>		
Top Navigation	<ul style="list-style-type: none"> - About - Blog / News - Publications - Docs/Wiki - Apps/functionalities/ (sub)services - Events - People - Contact 	
Footer	<ul style="list-style-type: none"> - Terms of Use - Accessibility 	<ul style="list-style-type: none"> - Privacy Policy - Imprint - "This project is funded as part of Base4NFDI, grant number: 521466146" - DFG logo - Base4NFDI logo - Licence: CC-BY-SA-4.0 (<i>is a criterion for the service or parts of the service</i>) - List licences for other used/integrated services/apps/content if necessary.
Design		<ul style="list-style-type: none"> - Font: Fira Sans - Logo or symbol of service: top left <p>Colours:</p> <ul style="list-style-type: none"> - Font colour text body: #313131 - Top navi bar bkg: #45546B - Top navi bar font: #FFFFFF - Top navi bar font hover: #0ABAFO - Link body: #0ABAFO - Link body hover: #45546B - Body background: #FFFFFF

Appendix

I How to create a GitHub page with a custom domain

If teams need support to set up the template or create the GitHub page with a custom domain, please contact Base4NFDI. If teams already have a repository with a static site that gets built with github actions to something.github.io, start at step 4.

1. Create a GitHub repo with a static site generator template, e.g. from <https://github.com/base4nfdi/website-template-hugo>
2. Enable pages from GitHub-Actions in the settings (Settings→ Pages→ Source: GitHub Actions)
3. Re-run the action to deploy the site (Actions→ click on last failed action→ top-right 're-run all actions')
4. The site should be available under <https://base4nfdi.github.io/your-repo-name>, where *base4nfdi* is the GitHub organisation in which the team created the repository
5. Now a DNS record for the subdomain needs to be created. For the [servicename].services.base4ndi.de subdomains, the Base4NFDI team will provide it upon request. The needed DNS record is:

service.example.com.	CNAME	base4nfdi.github.io.
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Where *service.example.com.* needs to be replaced by an existing subdomain and *base4nfdi* by the GitHub organisation the team's repository belongs to.
6. Now the custom domain can be set in the project. Again in Settings→ Pages enter the existing domain (*service.example.com*) into the Custom Domain box and hit save. If the DNS check fails, wait a bit to make sure the change is published, otherwise make sure the DNS record is correct (e.g. missing dot at the end)
7. After the DNS check passes, lastly set the new domain in the website configuration itself, so e.g. for Hugo in *config/_default/hugo.yaml*. After the GitHub action ran again, the site should be ready and available under the new domain!

II Imprint

It is mandatory to include an imprint on each web presence. This section gives guidance on imprint content and how to structure it. Notes in italic. Some terms remain in German due to German law.

Imprint

The institution responsible for the content of the web pages and subpages is also responsible for the imprint. Usually this is the lead institution of the basic service proposal that has a dedicated imprint.

(Hier steht das Impressum der Institution, die für den Inhalt der Seite verantwortlich ist. Das ist i.d.R. die Lead Institution. Mehr Informationen [hier](#).)

Content Representative (Verantwortlich für den Inhalt)

Name, contact info (email, phone)

(Kontaktinformationen - E-mail, Telefonnummer)

Name der Institution

Adresse der Institution

(Name und Adresse der Institution)

Regulating authority (zuständige Aufsichtsbehörde) and Umsatz-ID

Regulating authority: Name of the responsible regulating authority
(Details zur zuständige Aufsichtsbehörde)

VAT ID: VAT identification number, if applicable
(Umsatzsteuer - ID, falls zutreffend)

Privacy policy

Link to the Privacy Policy page
(Link zur Datenschutzerklärung)

Your rights

Include a concise statement on user rights regarding data protection, copyright, and access, e.g., "Users have the right to access, correct, and request the deletion of their personal data in accordance with applicable data protection laws."

(Ein kurzer Hinweis zu den Rechten der Nutzerinnen, z. B.: „Nutzerinnen haben das Recht auf Zugang, Berichtigung und Löschung ihrer personenbezogenen Daten gemäß den geltenden Datenschutzgesetzen.“)

The imprint is also valid for the following social media accounts

- Social Media Link 1
- Social Media Link 2

Copyright notice (Urheberrechtshinweis)

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Funding (mandatory)

This project is funded as part of Base4NFDI, grant number: 521466146.

(Dieses Projekt wird im Rahmen von Base4NFDI unter dem Förderkennzeichen 521466146 gefördert.)

Licensing (mandatory)

The contractual parties agree that the project results—particularly the developed (software) services, guidelines, recommendations, and potential infrastructure components—will be made available to the public under the Creative Commons License "Attribution - ShareAlike 4.0 International" (CC BY-SA 4.0) or another applicable license, such as a recognized Open Source License or CC Public Patent License. Funding may only be used for this purpose.

(Die Vertragsparteien vereinbaren, dass die Arbeitsergebnisse, insbesondere die zu entwickelnden (Software-)Dienste, Leitlinien und Handlungsempfehlungen sowie mögliche Infrastrukturkomponenten, der Allgemeinheit, soweit anwendbar, unter der Creative Commons Lizenz „Namensnennung - Weitergabe unter gleichen Bedingungen 4.0 International“ oder einer anderen anwendbaren, diesem Ziel dienenden Lizenz, bspw. einer anerkannten Open Source Lizenz bzw. CC Public Patent Licence, zur Verfügung gestellt werden. Fördermittel dürfen nur zu diesem Zweck vergeben werden.)

Base4NFDI (mandatory)

[Base4NFDI service name] is a basic service within Base4NFDI. For more information see the project page: www.base4nfdi.de

([Name des Base4NFDI-Dienstes] ist ein Basisdienst innerhalb von Base4NFDI.

Weitere Informationen finden Sie auf der Projektseite: www.base4nfdi.de.)

III Accessibility

The technical system behind web pages provides accessibility statements. It's crucial to follow key accessibility instructions. Checklists such as <https://www.a11yproject.com/checklist/> can be helpful.

(Hier steht die Barrierefreiheit des Systems/Institution, das für die technische Bereitstellung der Seite verantwortlich ist. Hierzu gibt es online Checklisten, die man konsultieren kann.)

Feedback and Support

If you experience any barriers while using the site or have suggestions for improvement, please contact us:

Email: (Contact Email address)

Phone: (Contact phone number)

IV Terms of use

Depending on implemented or included third-party services, terms of use need to be mentioned.

(Je nachdem welche Teildienste hinzugezogen werden, werden AGBs fällig.)

V Privacy policy



Caution: As Base4NFDI does not give any binding legal advice, it is recommended to let the privacy policy be checked by the Institution's responsible data protection officer.

V.1 Background information

Privacy policies must be provided by every website according to the law (Art. 12 [GDPR/DSGVO](#)). It must be accessible from every (sub)page of the website. We recommend linking it in the website footer.

A **privacy policy** is an informative document written for the users of a website ('data subjects'). It informs about all personal data processing that occurs during the regular use of that website and beyond.

Personal data is information that can be directly or indirectly used to identify a specific person, such as name, address, mail, ID-numbers, photos, location, or IP address (Art. 4(1) [GDPR/DSGVO](#)). There are specific regulations for so-called "special categories of personal data" such as data about religion, political opinions, health, genetics, race (Art. 9 [GDPR/DSGVO](#)).

A clear, easy-to-read, and accessible privacy policy not only ensures compliance but also fosters trust between the website and the users. Clearly state what 'personal data' includes in the privacy policy to help users understand what type of personal data is processed.

Privacy policies need to be up-to-date, and regularly reviewing privacy policies ensures compliance and protects against potential penalties. Any changes in data processing on a website require adjustments. This may be the case if, e.g.

- external services processing personal data are added, discontinued or settings are changed
- a new data protection officer is appointed
- data processing principles change (e.g. change of data processing purposes)
- the legal situation changes (e.g. national opening clauses)

Make sure that the privacy policy only reflects the specific jurisdiction(s) applicable to the website. Relevant law includes the General Data Protection Regulation ([GDPR/DSGVO](#)), the Federal Data Protection Act (Bundesdatenschutzgesetz - [BDSG-neu](#)), the applicable State Data Protection Laws (Landesdatenschutzgesetz - LDSG) as well as the Telecommunications and Telemedia Data Protection Act (Telekommunikations-Telemedien-Datenschutzgesetz - [TTDSG](#)) and the Digital Service Act (Digitale-Dienste-Gesetz - [DDG](#)).

Privacy policy generators usually only cover standard cases and default settings of third party services that need to be adjusted to the specific data processing. Also, using their content often requires a mandatory note with a link to the generator in the privacy policy. It is always a good practice to get the generated policy reviewed by a privacy specialist.

V.2 Privacy policy content and structure

Art. 13 and 14 [GDPR/DSGVO](#) determine what information a privacy policy needs to provide.

Consequently, a privacy policy roughly consists of two parts:

- **General information sections** informing about data protection along with rights (chap. 3 [GDPR/DSGVO](#)) and contact options the website users ('data subjects') have regarding their personal data and its collection on the website.
- Sections informing about **external data processing** by third parties (one paragraph per service) on the website. These sections are necessary only for services that are integrated into the website. However, there are obligations for the content of these paragraphs, which are explained below.



The privacy policy template comes with an adjustable structure and content as well as examples for paragraphs on external data processing. Please skip third-party processing content and examples if no third-party data processing is involved.

General information <i>mandatory</i>	External data processing by third parties <i>paragraph only mandatory if applicable</i>
<ul style="list-style-type: none"> ● General information on data protection and the related use of the website ● Legal basis and purpose(s) of data processing by the data controller (website operator) & third parties (see Art. 6 GDPR/DSGVO) ● Rights of and contact options for data subjects (e.g. contact details of responsible data controller and data protection officer) ● Information that privacy policy is subject to change ● Explanation of terms if necessary (see Art. 4 GDPR/DSGVO) 	<p>Examples:</p> <ul style="list-style-type: none"> ● Cookies ● Server log files ● CMS (e.g. WordPress) / static site generator ● Fonts (e.g. Google Fonts) ● Contact options (e.g. via mail, contact form) ● Interactive elements (e.g. comment fields) ● Newsletter (incl. CAPTCHA, tracking) ● Tracking & Analytics Tools (e.g. Matomo, Google Analytics, Google Adwords) ● Maps (e.g. OpenStreetMap, Google Maps) ● Plugins and other website extensions (e.g. social media, Open Project) ● APIs ● Account creation & login ● ...

Likewise, **paragraphs on external data processing** must suffice the information requirements stated in Art. 13/14 [GDPR/DSGVO](#) if that information is not given elsewhere in the privacy policy. This typically includes, but is not limited to, the following information:

- Name (and address) of the service provider
- Legal basis and purpose of data collection (see Art. 6 [GDPR/DSGVO](#); as purpose e.g. receiving the newsletter)
- Scope of the processing of personal data
 - Type of data processing (e.g. collection, recording, structuring, storage, adaptation, alteration, retrieval, ...)
 - Types of personal data collected (enumeration, e.g. name, address, IP address, ...)
 - Data source (if data is not indicated by data subject)
 - Duration and location of data storage/servers (e.g. Germany/EU/other countries)
 - Data recipient
 - If there is any, mention of data processing agreement (dt. Auftragsverarbeitungsvertrag) with the service provider
 - Enumeration and consequences of further integrated data collection as part of the service (e.g. reCAPTCHA, newsletter tracking)
- Instructions on how to object the collection of personal data (lowest possible effort, e.g. provide a link or checkbox) along with possible consequences/disadvantages for the data subject

- It is a good practice to use features such as an easy opt-out mechanism for cookies or data deletion to simplify compliance and improve user satisfaction
- Link to the privacy policy of the service provider for further information

It is recommended by the Data Protection Authorities to use non-technical, user-friendly language and format so users better understand their rights and website privacy practices.

V.3 Data processing principles

If personal data is collected and processed (e.g. if active indication of personal data is integrated and offered to the website users) the following **data processing principles** should be kept in mind:

- **Lawfulness, fairness and transparency** (Art. 5(1a) [GDPR/DSGVO](#))
 - “Personal data shall be processed lawfully, fairly, and in a transparent manner in relation to the data subject”
 - **What that means:** Always make all personal data processing transparent and easy to understand, e.g. in the privacy policy.
- **Purpose limitation** (Art. 5(1b) [GDPR/DSGVO](#))
 - “Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes”
 - **What that means:** All purposes regarding data processing on the website have to comply with the regulations in Art. 6 [GDPR/DSGVO](#) and need to be specified in the privacy policy. As they are the legal basis for personal data processing, it is required to strictly adhere to them. Special regulations may apply for scientific research purposes (see Art. 89(1) [GDPR/DSGVO](#)).
- **Data minimisation** (Art. 5(1c) [GDPR/DSGVO](#))
 - “Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed”
 - **What that means:** One may only collect a minimum set of data that is necessary to fulfil the respective data processing purpose. The collection of further data requires consent from the data subject.
- **Accuracy** (Art. 5(1d) [GDPR/DSGVO](#))
 - “Personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.”
 - **What that means:** Always keep stored personal data accurate and up-to-date. Inaccurate data needs to be corrected or deleted.
- **Storage Limitation** (Art. 5(1e) [GDPR/DSGVO](#))
 - “Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the

personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject.”

- **What that means:** Only store personal data as long as necessary to fulfil the processing purpose. Therefore, define and implement time limits for erasure. Statutory storage obligations (‘gesetzliche Aufbewahrungspflichten’) may apply.
- **Integrity and confidentiality** (Art. 5(1f) [GDPR/DSGVO](#))
 - “Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”
 - **What that means:** Use technical and organisational measures such as encryption, regular security updates and access controls to ensure secure data processing.

Additionally, keep the following regulations in mind:

- **Rights of the data subject** (chap. 3 [GDPR/DSGVO](#))
 - Data subjects have certain rights regarding their personal data, given in chap. 3 GDPR, that also need to be transparently communicated in the privacy policy or when requesting consent. Data subjects can exercise these rights at any time.
 - **Comment:** When creating a privacy policy, it's important to have a clear process in place from the start for handling requests related to personal data. This includes knowing what data is stored, how it can be accessed, and how it can be deleted. Rather than waiting for a user request, this procedure should be established at the time the privacy policy is written, ensuring everything is ready for action if and when needed.
- **Conditions of consent** (Art. 7/8 [GDPR/DSGVO](#))
 - If data subjects are asked for consent to process their personal data, one needs to be able to demonstrate that this consent was given (e.g. in written form). Consent requests must be written in clear and plain language. Consent can be withdrawn by the data subject at any time, and the withdrawal must be as easy as giving consent. Children can give consent from the age of 16.
- **Processing of special categories of personal data** (Art. 9 [GDPR/DSGVO](#))
 - The processing of personal data revealing racial/ethnic origin, political opinions, religious/philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a

natural person's sex life or sexual orientation is only legitimate under certain conditions, given in Art. 9 GDPR.

- **Data protection by design and by default** (Art. 25 [GDPR/DSGVO](#))
 - In the technical design, it is required to incorporate GDPR regulations to protect the rights of the data subject accordingly at all times. When asking for data entry or consent, it is required to have user-friendly pre settings only asking for minimum data necessary to fulfil the respective data processing purpose (e.g. "no" as default, single click to deselect all options).
- **Communication of a personal data breach to the data subject** (Art. 34 [GDPR/DSGVO](#))
 - In case of a personal data breach, respective data subjects need to be notified under certain conditions, described in Art. 34 GDPR.

For further guidance on the language of the privacy policy and interpretation of GDPR please refer to the guidelines below by the European Data Protection Board (EDPB):

- **[Guidelines on Transparency under GDPR](#)**
- **[EDPB Guidelines on consent](#)**
- **[EDBP Guidelines for Data Subject Rights](#)**

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The Privacy Policy Template will be sent to the basic service teams separately.