

## **Confidentiality Policy for M24 Sunshine**

*Last Updated: 28 January 2025*

### **1. Purpose**

The purpose of this Confidentiality Policy is to protect and maintain the confidentiality of sensitive information related to M24 Sunshine S.à r.l., its employees, clients, and partners. This policy is intended to safeguard against unauthorized access, use, disclosure, alteration, or destruction of confidential information. All personnel, including employees, contractors, consultants, and third-party partners, are required to comply with this policy.

### **2. Scope**

This policy applies to all employees, officers, directors, contractors, and any other individuals authorized to access confidential information of M24 Sunshine S.à r.l., Numéro d'immatriculation : B292730 ("Company" or "we"), whether in electronic, physical, or verbal form.

### **3. Definition of Confidential Information**

Confidential Information includes, but is not limited to, the following types of information:

- **Business Information:** Business plans, strategies, projects, financial data, and contracts.
- **Client Information:** Personal data, business information, and other details about clients that are not publicly available.
- **Employee Information:** Personal details, employment records, compensation, and benefits information.
- **Intellectual Property:** Proprietary information, including trade secrets, research and development data, software, and other intellectual property owned by or licensed to the Company.
- **Technical Information:** System specifications, source code, network designs, and security protocols.
- **Other Sensitive Information:** Any other information labelled as "confidential" or any information that, if disclosed, could harm the Company or its stakeholders.

### **4. Confidentiality Obligations**

All personnel of M24 Sunshine are required to:

- Treat all confidential information as strictly private and secure.

- Only use confidential information for purposes directly related to their role within the Company.
- Not disclose, transmit, or share confidential information with unauthorized parties.
- Prevent unauthorized access to confidential information by securely storing all electronic and physical records.
- Immediately report any suspected or actual unauthorized access, use, or disclosure of confidential information to management.

## **5. Data Protection and Security Measures**

To protect confidential information, the Company has implemented the following security measures:

- **Access Control:** Confidential information is accessible only to authorized personnel based on their role and responsibilities.
- **Encryption:** All electronic data transfers involving confidential information are encrypted.
- **Physical Security:** Access to areas storing physical confidential information is restricted.
- **Data Disposal:** Confidential information is securely disposed of when no longer needed, in accordance with Company policies.

## **6. Data Breach Reporting**

In the event of a suspected or actual data breach involving confidential information, employees and other personnel must report the incident immediately to their supervisor or the designated data protection officer. The Company will take appropriate action to investigate and mitigate any security breach.

## **7. Third-Party Confidentiality**

Any third-party service providers or contractors with access to the Company's confidential information are required to sign a non-disclosure agreement (NDA) and adhere to our confidentiality standards. Third parties must also take adequate security measures to protect all confidential information provided by the Company.

## **8. Consequences of Policy Violations**

Violations of this Confidentiality Policy may result in disciplinary action, up to and including termination of employment or contract. Unauthorized disclosure of confidential information may also result in legal action and liability for damages incurred by the Company.

## **9. Review and Revisions**

This Confidentiality Policy is reviewed regularly to ensure compliance with applicable laws and the evolving needs of the Company. The Company reserves the right to update this policy at any time, and the latest version will be posted on the Company's intranet or provided to personnel.

## **10. Acknowledgment and Agreement**

All employees, contractors, and other authorised individuals must sign a confidentiality agreement acknowledging their understanding of this policy and their responsibility to protect confidential information.

## **11. Contact Information**

For any questions or concerns regarding this Confidentiality Policy, please contact:

### **M24 Sunshine**

Numéro 14A, Rue des Bains, 1212, Luxembourg

Luxembourg

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