



Confidentiality Policy

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PURPOSE OF THE POLICY

This Confidentiality Policy sets out the principles and mandatory rules governing the protection, handling, and disclosure of confidential information in connection with the activities of Mid Atlantic Films, its affiliated production entities and its productions.

The purpose of this Confidentiality Policy is to:

- protect Mid Atlantic Films', its affiliated production entities' and its productions' business, creative, financial and operational interests;
- ensure compliance with applicable Hungarian and EU laws;
- safeguard personal data and trade secrets; and
- preserve trust with partners, studios, cast, crew and business counterparties.

SCOPE AND APPLICABILITY

This Policy applies to all individuals and entities who:

- work for or with Mid Atlantic Films, its affiliated production entities and its productions,
- participate in any production, or
- have access to information related to Mid Atlantic Films, its affiliated production entities and its productions,

including but not limited to:

- cast and crew members,
- subcontractors,
- vendors, suppliers and service providers,
- extras,
- consultants, agents and intermediaries,
- any third party representing Mid Atlantic Films, its affiliated production entity or its production.

This Policy applies in addition to and without prejudice to any:

- confidentiality clauses,
- non-disclosure agreements (NDAs),

- production agreements, or
- statutory confidentiality obligations.

Where multiple confidentiality obligations apply, the stricter obligation shall prevail.

DEFINITION OF CONFIDENTIAL INFORMATION

Confidential information includes, without limitation, any non-public information relating to:

a) Productions and Creative Content

- scripts, storylines, characters, concepts;
- schedules, call sheets, budgets;
- shooting locations, set designs, props, costumes, picture vehicles;
- audiovisual materials, dailies, stills, recordings.

b) Business and Corporate Information

- internal procedures and policies;
- financial data, contracts, pricing, strategies;
- client, partner and supplier information;
- internal communications.

c) Personal Data

- personal data of cast and crew members, extras and partners,
- processed in accordance with Hungarian and EU GDPR regulations and Mid Atlantic Films', its affiliated production entities' and its productions' privacy policies.

Confidential Information may exist in any form, including written, oral, electronic, visual or digital formats.

PROHIBITED DISCLOSURES AND CONDUCT

Unless expressly authorized in writing by the Company, it is strictly prohibited to:

- disclose confidential information to unauthorized persons and third parties;
- share information via messaging apps or social media platforms (including but not limited to WhatsApp, Instagram, TikTok, Facebook, LinkedIn);
- take or distribute photographs, videos, audio recordings, or screenshots related to Mid Atlantic Films, its affiliated production entities and its productions;

- discuss production or company matters with media or third parties;
- handle, store or transmit confidential information through unapproved systems or channels.

PERMITTED DISCLOSURES - LIMITED EXCEPTIONS

The confidentiality obligation does not apply to disclosures that are:

- required by applicable law, regulation, or binding court or authority order;
- made in response to a lawful request by a competent authority;
- made to legal advisers or professional consultants for the purpose of obtaining legal or professional advice;
- made in good faith for the purpose of reporting misconduct or compliance concerns, in accordance with applicable whistleblowing or reporting procedures.

Where legally permissible, Mid Atlantic Films shall be notified in advance of any such disclosure.

DURATION OF CONFIDENTIALITY OBLIGATION

The confidentiality obligation applies:

- throughout the entire duration of the engagement, and
- after its termination, for as long as the information remains confidential.

Certain business-sensitive or trade secret information may remain confidential indefinitely.

PERSONAL DATA AND DATA PROTECTION

Confidential information that includes personal data must be:

- processed strictly on a need-to-know basis;
- shared only through approved and secure channels;
- handled in accordance with Hungarian and EU GDPR regulations and Mid Atlantic Films', its affiliated production entities' and its productions' Data Privacy Notice.

Unauthorized access, use, or disclosure of personal data is strictly prohibited.

REPORTING AND NON-RETALIATION

Any suspected or actual breach of this Confidentiality Policy must be reported promptly to:

- the Line Producer / the Production Manager,
- the Production Office, or
- the designated Mid Atlantic Films contact for the production.

The Company prohibits any form of retaliation against individuals who report concerns in good faith.

CONSEQUENCES OF BREACH

Any breach of this Confidentiality Policy may result in:

- disciplinary action,
- termination of engagement or contract,
- civil liability, and/or
- criminal or regulatory consequences

in accordance with applicable laws and contractual arrangements.

RELATIONSHIP TO OTHER POLICIES AND AGREEMENTS

This Confidentiality Policy forms part of the Company's corporate compliance framework and must be read together with:

- Non-Disclosure Agreements (NDAs),
- Data Protection and Privacy Policies,
- Code of Conduct,
- Anti-Bribery & Compliance Policy,
- and contractual confidentiality provisions.

REVIEW AND AMENDMENTS

This Confidentiality Policy may be updated from time to time to reflect changes in law, industry standards or corporate practices.