



Maine - Employee Surveillance Policy

This employee surveillance policy (this "Policy") outlines DLP Real Estate Capital Inc.'s (the "Company") practices regarding electronic surveillance of Company Team Members working in Maine and explains employee rights and protections under Maine law.

The Company respects the privacy of its Team Members. However, to ensure workplace safety, protect Company assets, and maintain operational efficiency, the Company utilizes electronic monitoring and employer surveillance systems. This Policy outlines the Company's monitoring practices and ensures compliance with Maine Law 26 M.R.S. § 620-A and further serves to formally notify Team Members that the Company engages in some forms of employer surveillance as defined herein.

Scope: This Policy applies to all prospective and current Team Members of the Company and its subsidiaries working in the state of Maine. For purposes of this Policy "employer surveillance" means any electronic monitoring conducted by the Company through the use of an electronic device or system, including but not limited to, the use of computers, telephones, wireless communications, electromagnetic, photoelectronic or photo-optical systems.

What is NOT considered surveillance under this Policy:

- Security cameras used for security or safety purposes
- GPS tracking or other safety devices on Company-owned vehicles
- Monitoring required for compliance with state or federal laws or regulations

Authorized Monitoring Practices

The Company may engage in the following monitoring:

- **Computer & Network Activity:** Monitoring and logging of internet usage, IP location address, login & logout times, email, instant messages sensitive information leaving our network, and files and information created, received or stored on company-owned systems and networks.
- **Telephone Systems:** Recording or monitoring of business telephone calls.
- **Workplace Security:** Use of video surveillance cameras in common areas for safety and security purposes.
- **GPS Tracking:** Use of GPS and other safety devices on Company-owned vehicles operated by employees.

Prohibited Practices and Employee Rights

In accordance with Maine law, the Company will **NOT**:

- Engage in audiovisual monitoring as a means of employer surveillance in the following locations* unless it is specifically required for your job duties:
 - Your residence or home
 - Your personal vehicle
 - Your personal property

*If audiovisual monitoring is required for your job duties in these locations, you will be notified in advance.

- Require Team Members to install data-collection or transmission applications (e.g., tracking or monitoring software) on their personal electronic devices for surveillance purposes. Team Members have the absolute right to decline these requests.

Notice and Disclosure Requirements

- **Job Applicants:** All prospective Team Members will be informed during the interview process that the Company engages in employer surveillance.
- **Current Team Members:** Current Team Members will receive this written notice at least once per calendar year and prior to the commencement of any new, applicable surveillance programs.

Expectations of Privacy

Team Members should have no expectation of privacy when using Company electronic equipment, networks, systems or facilities. Electronic communications and data are the property of the Company and may be reviewed at any time.

Compliance with Other Laws

This Policy does not limit the Company's ability to comply with state and federal laws, rules or regulations related to security, safety, and data handling. Surveillance practices may be adjusted as needed to meet legal requirements.

Policy Violations

Tampering with, disabling or bypassing Company surveillance or monitoring systems is strictly prohibited and may result in disciplinary action, up to and including termination of employment.