



**INNOVATE CORP.
(f/k/a HC2 HOLDINGS, INC.)**

PRIVACY POLICY

This privacy policy outlines how INNOVATE Corp. collects, uses and transfers any personal data that you provide to us, and which we may also collect as a result of your use of our website and digital platforms or through communications with you.

INNOVATE Corp. (“INNOVATE”) (also referred to as “we”, “us” or “our” in this privacy policy) respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and inform you about your privacy rights and how the law protects you.

Please use the Glossary in Section 10 of this policy to understand the meaning of some of the terms used in this privacy policy.

1. IMPORTANT INFORMATION

Purpose of this privacy policy

This privacy policy aims to give you information on how INNOVATE collects and processes your personal data through your use of this website and your other interactions with INNOVATE.

This website is not intended for children and we do not knowingly collect data relating to children. If we obtain actual knowledge that any information we collect has been provided by a child under the age of 13, we will promptly delete that information.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Who we are

INNOVATE is a publicly traded (NYSE: VATE) diversified holding company headquartered in New York.

INNOVATE is the data controller and responsible for the personal data collected through your use of this website and your other interactions with INNOVATE.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our Data Protection Officer in any of the following ways:

Full name of legal entity: INNOVATE Corp.

By Email at corpsec@innovatecorp.com

By Mail or Overnight Courier to:

295 Madison Avenue, 12th Floor
New York, NY 10022
United States

By Phone at +1-212-235-2691

If you are located in the European Union (“EU”) you have the right to make a complaint at any time to a relevant national data regulator. We would, however, appreciate the chance to deal with your concerns before you approach the relevant data regulator and we therefore kindly ask that you contact us in the first instance.

Changes to the privacy policy

We keep our privacy policy under regular review. This version was last updated in June, 2019. If we make material changes to this privacy policy that modify our rights to use information we have previously collected about you, we will notify you either through an email to your registered email address or by prominent posting on our site to notify you and, where appropriate, obtain your consent.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes title, first name, last name, position in your organization.

- **Contact Data** includes physical addresses, email address, telephone numbers and fax numbers.
- **Securities Data** includes details about securities you may hold in INNOVATE.
- **Financial Data** includes bank account or financial holdings information, any tax identification numbers (or similar), and your investor type.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Technical Data** includes internet protocol (IP) address; your login data, browser type and version; time-zone setting and location; browser plug-in types and versions; operating system and platform, and other technology on the devices you use to access this website; and your interests, preferences, feedback and search terms.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Technical Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data (“Special Categories of Personal Data”). Nor do we collect any information about criminal convictions and offences.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions:** when you contact us, access our digital platforms and/or to receive information from us, or are engaged to provide a service to us.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources including analytics providers such as Google (based outside the EU) and search information providers based inside the EU.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Cookies

When you use this website, INNOVATE may place a small text file or files (pieces of code), which is stored on your computer in order to recognize your computer at recurring visits, commonly referred to as “cookies,” or similar technology on your devices. INNOVATE uses cookies to collect information about how you use this website. You are always free to decline cookies via your browser settings, although doing so may interfere with your use of the site. You may encounter cookies from third parties that we do not control. However, disabling cookies from INNOVATE may prevent you from using various features of this website, and generally we need to use cookies to help identify you and maintain your signed-in status.

We may additionally collect personal data using pixel tags, web beacons or other web site usage tracking technologies. Web beacons (also known as "tracking pixels") are electronic images that may be used on our website or in emails that we send to you. We may use web beacons to deliver cookies, count visits, understand usage and campaign effectiveness and to tell if an email has been opened and acted upon. Such devices are used to collect nonpersonal data, such as the identity of the applicable internet service provider, the type of browser software and operating system in use, the date and time of site access, the website address, if any, from which the user linked to the site and other similar traffic-related information. We also may aggregate such information with similar data collected from other users. However, we do not use such data in any way to create or maintain personal data about you.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, including:
 - to deliver relevant content to you;
 - to make suggestions and recommendations to you about goods or services that may be of interest to you;
 - to prevent fraud, to enforce this website’s Terms of Use, and to enforce INNOVATE’s agreements; and
 - to establish, exercise and/or defend our legal rights including in any legal proceedings.
- Where we need to comply with a legal obligation, including:
 - complying with any applicable regulatory requirements;

- complying with all applicable laws and INNOVATE's corporate reporting obligations; or
- data protection rules.
- Where you have consented to the particular use of your data, including:
 - sending you marketing emails;
 - taking part in surveys;
 - to respond to requests for information and client inquiries submitted through the website's Information Request form
 - to offer you information and promotional material about the products and services you see on our site.

You have the right to withdraw consent to marketing at any time by contacting us.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out.

Marketing

We may use your Identity and Contact information to form a view on what we think you may want or need, or what may be of interest to you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in Section 4.

- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

INNOVATE may also provide to third parties, including other businesses and members of the public, aggregated statistical data showing general usage patterns and statistics about our site and interactions. This data does not personally identify you or provide specific information about individual usage.

6. INTERNATIONAL TRANSFERS

We are based in New York, USA, and as such transfers of your personal data to us may involve a transfer of data outside the European Economic Area (“EEA”). Some of our external third parties are also based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we hold and/or transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission or where we have implemented other adequate data transfer mechanisms.

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA. We reserve the right to store different sets of personal data differently depending on the regulatory and/or legislative regime applicable to such personal data.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

9. YOUR LEGAL RIGHTS

If you are located in the European Economic Area (“EEA”):

Under certain circumstances, you have rights under EEA data protection laws in relation to your personal data. You have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data’s accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

If you are located in California:

When effective on January 1, 2020, the California Consumer Privacy Act (“CCPA”) grants consumers within the State of California the following rights:

- The right to request a copy of the personal information we hold about you or your household.

- The right to request a listing of all third parties with whom we have shared your personal information.
- The right to request that your personal information be deleted.
- The right to opt-out of the sale of your data to third parties.

Should you wish to exercise any of these rights under the CCPA, please call (844) 825-1254 or visit [INNOVATEprivacy.ethicspoint.com](https://www.innovateprivacy.ethicspoint.com).

Automated Decision Making

INNOVATE does not engage in ADM.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month if related to EEA personal data and within 45 days if related to California personal data. Occasionally it could take us a bit longer in each jurisdiction to provide a response if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

“Automated Decision Making” refers to a decision which is taken solely on the basis of automated processing of your personal data. This means processing using, for example, software code or an algorithm, which does not require human intervention.

“Comply with a legal obligation” means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

“Legitimate Interest” means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your

personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

“Performance of Contract” means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

“External Third Parties”

Service providers acting as processors based inside and outside the EU, including in the United States, who provide IT and system administration services and secure cloud-based information storage services.

- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the EU or United States who provide consultancy, banking, legal, insurance and accounting services.
- Any data regulators and other authorities acting as processors or joint controllers based in the EU who require reporting of processing activities in certain circumstances.

DOCUMENT HISTORY:

| Revision | Date |
|---|--------------------|
| Adopted | June 13, 2019 |
| Amended and Restated to change the Company name | September 20, 2021 |