

## **INNOVATE CORP.**

### **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 under the age of 16 and we do not knowingly collect data relating to children. If you are under the age of 16, do not use or provide any information on this Website. If we obtain actual knowledge that any information we collect has been provided by a child under the age of 16, we will promptly delete that information. If you are under 16, please do not submit any personal data to us.

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](mailto:corpsec@innovatecorp.com)

**By Mail or Overnight Courier to:**

295 Madison Avenue, 12<sup>th</sup> Floor  
New York, NY 10017  
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 updated in October 2022. 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 AND HOW WE COLLECT IT

Personal data, or personal information, means any information that can be reasonably related to an identifiable individual or household. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer personal data including your email address, if you request to receive our email alerts, and some technical information through the use of cookies on our website. We do not collect, use, store, or transfer any other personal data. We may collect your email address through direct communication with you. Please see below for a description of cookies and how we use them.

It is important that the personal data we hold about you is accurate and current. If you are a resident of California, Virginia, Colorado, or Connecticut, you have the right to request that we correct the personal data we store about you. Please keep us informed if your personal data changes during your relationship with us.

## **Cookies**

Like most websites, ours uses small text files (pieces of code) stored on your computer in order to recognize your computer at recurring visits, which are 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 technical information 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.

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 be reasonably related to you, directly or indirectly, we treat the combined data as personal data which will be used in accordance with this privacy policy.

## **2. SENSITIVE PERSONAL DATA**

We do not collect any information about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, precise geolocation, government identifiers such as social security number, the contents of your communications not directed to us, and genetic and biometric data (“Special Categories of Personal Data”). Nor do we collect any information about criminal convictions and offences.

## **4. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we use your email address to deliver relevant content to you, including our email alerts.

On rare occasions, we may also need to use your personal data for the following purposes:

- 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 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
  - complying with data protection rules.

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.

### **Third-party marketing**

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

### **Targeted Advertising**

We will get your express opt-in consent before we use or share your personal data with any third party for targeted advertising.

### **Opting out**

You can ask us to stop sending you email alerts at any time by contacting us.

### **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 do not share your personal data to third parties, except to our investor relations firm for the purpose of sending you email alerts and to External Third Parties as set out in the Glossary for the purpose of providing services to us, such as information technology or cloud hosting services.

In rare cases, we may also share your personal data to 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. We will never sell or share your Sensitive Personal Data with third-parties without your express consent and an opportunity to opt-out of such sale or sharing.

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.

Please contact us if you want further information on the specific mechanisms 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 administrative, technical, and physical 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 fulfill 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”) or the United Kingdom:**

Under certain circumstances, you have rights under European 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 using the information below.

**By Email** at [corpsec@innovatecorp.com](mailto:corpsec@innovatecorp.com)

**By Mail or Overnight Courier to:**

295 Madison Avenue, 12<sup>th</sup> Floor  
 New York, NY 10017  
 United States

**By Phone** at +1-212-235-2691

**If you are located in California:**

The California Consumer Privacy Act (“CCPA”) and California Privacy Rights Act grant consumers within the State of California the following rights:

- The right to access or request a copy of the categories or specific pieces of personal information we hold about you or your household.
- The right to correct the personal information we hold about you or your household.
- The right to limit our processing of your sensitive personal information.
- The right to request a listing of all third parties with whom we have shared your personal information and the categories or specific pieces of personal information that we shared with each category of those third parties.

- The right to request that your personal information be deleted.
- The right to opt-out of the sale or sharing of your data to third parties.
- The right to access information about, and opt-out of, automated decision making.
- The right of non-discrimination or non-retaliation for exercising any of these rights.

Should you wish to exercise any of these rights under the CCPA, please call (844) 825-1254 or visit [NavexGlobal/EthicsPoint](#).

**If you are located in Colorado, Virginia, Connecticut, or Utah:**

Residents of Colorado, Virginia, Connecticut, or Utah may exercise similar rights as those described above for California residents, although not all rights that apply to California residents also apply to residents of Colorado, Virginia, Connecticut, and Utah. To exercise your privacy rights as a Colorado, Virginia, Connecticut, or Utah resident, please contact us by phone at (844) 825-1254 or by email at [corpsec@innovatecorp.com](mailto:corpsec@innovatecorp.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 information includes at least your name and email address. 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 generally within 45 days if related to personal data of US residents. 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” or “ADM” 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:**

<b>Revision</b>	<b>Date</b>
Adopted	June 13, 2019
Amended and Restated to change the Company name	September 20, 2021
Amended and Restated to comply with current laws	November 9, 2022
Administrative revisions	November 2, 2023