Privacy Policy — Hubexo (Thailand) Co., Ltd.

Effective 28 May 2026

This Policy explains how Hubexo (Thailand) Co., Ltd. ("**Hubexo Thailand**", "**we**") handles personal data in Thailand. It is issued under the **Personal Data Protection Act B.E. 2562 (2019)** (the "**PDPA**") and the subordinate notifications of the Personal Data Protection Committee ("**PDPC**").

Hubexo Thailand provides B2B subscription services to the construction industry. For most processing on our subscription platforms we act as a **data processor** (ผู้ประมวลผลข้อมูลส่วนบุคคล) on behalf of the Hubexo group and our customers, who are the controllers. For the operation of our marketing website, recruitment, direct correspondence with prospects and customers, and the internal management of our staff, we act as a **data controller** (ผู้ควบคุมข้อมูลส่วนบุคคล).

We may update this Policy from time to time. The current version is always available on our website.

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1. Personal data we process

Depending on your interaction with us, we may process:

- **Customer and prospect data** — name, business contact details, billing information, and any information you provide to us through enquiries, support tickets or feedback.
- **User account and usage data** — login records, device and browser information, IP address, geolocation inferred from IP, in-platform interaction and usage data (such as page views, clicks and watchlist actions), and information you enter into the platform (notes, tasks, custom fields, project records).
- **Recruitment data** — your CV, employment history and any other information you provide as part of a job application.
- **Project-database data** — name, business contact details and role of persons connected with construction projects recorded in our database (project owners, developers, builders, architects, planners, consultants, suppliers).

We collect this data directly from you, from your use of our products and websites (including through cookies and similar technologies described in the Hubexo group Cookie Policy), and — for project-database records — from publicly accessible Thai government and industry registers and other publicly accessible sources, and from industry sources including direct enquiries to project participants and information provided by industry contacts.

Sensitive personal data under Section 26 PDPA

We do not routinely collect personal data classified as sensitive under Section 26 of the PDPA. Where we do process such data, we do so in accordance with the PDPA.

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2. Lawful bases

We rely on the lawful bases recognised by Section 24 (and, for sensitive data, Section 26) of the PDPA, including:

- **performance of a contract** — for delivering our subscription services and managing our customer relationships (Section 24(3));
- **legitimate interest** — for operating, securing and improving our platforms, for maintaining the project-database and supplying industry intelligence to our customers, and for fraud and abuse prevention (Section 24(5)), balanced against your interests and fundamental rights;
- **compliance with a legal obligation** — for tax, accounting, employment and law-enforcement-cooperation obligations (Section 24(6)); and
- **consent** — for marketing communications, for sensitive personal data and for any other processing for which the PDPA requires consent.

Where the lawful basis is consent, you may withdraw it at any time by contacting us at the address in Section 7, without affecting the lawfulness of processing before withdrawal.

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3. Purposes of processing

We use personal data to:

- provide our subscription products and services and manage customer accounts;
- operate our marketing website and respond to enquiries;
- send marketing and product communications to those who have consented or with whom we have an existing customer relationship, in each case in accordance with applicable law;
- process job applications;
- maintain and improve the project-database content made available to subscribed customers;

- operate, support, secure, troubleshoot and improve our platforms, including through product analytics, error monitoring and experimentation;
- meet our legal, accounting, tax and reporting obligations under Thai law; and
- prevent and investigate fraud, abuse, misuse of our services and breaches of our terms.

Children

Our services are B2B and are not directed to children. We do not knowingly collect personal data of children.

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4. Recipients of personal data

We may disclose personal data to:

- **other companies in the Hubexo group** (located in Sweden, the United Kingdom, Australia, New Zealand, Malaysia, Singapore, the Philippines, Indonesia, Vietnam, Hong Kong and other countries);
- **service providers** acting on our behalf, by functional category: technology-hosting and infrastructure, product-analytics and error-tracking, marketing-platform, payment-processing, customer-support, and professional advisers;
- **other registered users from your organisation**, in accordance with your subscription configuration;
- **customers of Hubexo** who subscribe to our project-database products, in accordance with the licence terms of those products;
- **recipients in the recruitment process**, such as referees and payroll providers, where you have applied for a role;
- **competent authorities**, where required, authorised or permitted by Thai law, including the Office of the PDPC; and
- **anyone else you authorise us to disclose information to**.

Cross-border transfers

Some of the recipients listed above are located outside Thailand. Where we transfer personal data outside Thailand we do so in accordance with Section 28 of the PDPA and applicable Thai law.

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5. Security and retention

We apply technical and organisational measures appropriate to the risk to protect personal data, in accordance with Sections 37 and 38 of the PDPA.

We retain personal data for as long as is necessary for the purposes set out in this Policy and to comply with our legal obligations under Thai law. When we no longer require personal data, we destroy or de-identify it.

Personal-data breach notification

If we become aware of a personal-data breach (เหตุการละเมิดข้อมูลส่วนบุคคล) that is likely to result in risk to the rights and freedoms of natural persons, we will notify the Office of the PDPC and, where the risk is high, the affected data subjects, in accordance with Section 37(4) of the PDPA and the subordinate notifications of the PDPC.

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6. Your rights

Subject to the conditions and exceptions in the PDPA, you have the right to:

- be informed about the processing of your personal data (Section 23);
- access and obtain a copy of your personal data (Section 30);
- request rectification of personal data that is incomplete, inaccurate or out of date (Section 35);
- request deletion or anonymisation of your personal data, or the suspension of its use, in the circumstances set out in Sections 33 and 34;
- data portability (Section 31);
- object to processing of your personal data, including for direct-marketing purposes, except where we are able to demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or the processing is for the establishment, compliance, exercise or defence of legal claims (Section 32);
- withdraw your consent at any time, where processing is based on consent (Section 19); and
- lodge a complaint with the Office of the PDPC.

To exercise any of these rights, please contact us at the address in Section 7. We will respond within the timeframes required by the PDPA.

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7. Enquiries and complaints

For any privacy enquiry, request to exercise a right under the PDPA or complaint, please contact us:

- **Postal:** Hubexo (Thailand) Co., Ltd., No. 287 Liberty Square Building, Room 2301, 23rd Floor, Silom Road, Silom Sub-district, Bang Rak District, Bangkok 10500, Thailand
- **Email:** privacy.th@hubexo.com

If your complaint cannot be resolved to your satisfaction, you may lodge a complaint with the Office of the Personal Data Protection Committee (สำนักงานคณะกรรมการคุ้มครองข้อมูลส่วนบุคคล) — see https://www.pdpc.or.th/.

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8. Data Protection Officer

Our Data Protection Officer is **Jenny Tadeo**, contactable at privacy.th@hubexo.com.