



Humanica Public Company Limited

Privacy Policy for Customers

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Documentation of Changes

Version	Operator	Enforcement Date	Details
1.0	PDPA Project Working Team	31 st of May 2022	Document Creation
1.1	Humanica PCL.'s Marketing team and accounting team	4 th of July 2022	Revised document content and format reviewed and updated the authorized person and position.
1.2	Humanica PCL.'s Marketing team	16 th of August 2022	Extend the content for the customer testimonial.
1.3	DPO	10 th of July 2023	Update DPO contact number
1.4	Humanica PCL.'s IT security team	14 th of August 2024	Annually Review
2.0	DPO	15 th of May 2025	Revised document content and format reviewed and updated to apply to the Group Company.
2.1	DPO Working team	23 rd of February 2026	Annually Review
2.2	DPO Working team	20 th of August 2026	Added provisions regarding the use of Personal Data in AI systems and AI-enabled features.

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Privacy Policy for Customers

The Humanica Group, including Humanica Public Company Limited and its subsidiaries (hereinafter “Company” or “Humanica Group”) aims to protect your Personal Data as you are the Humanica Group’s customer. Your Personal Data will be protected under the Personal Data Protection Act B.E. 2562. The Humanica Group as the Data Controller has the legal duty to inform you via this document of the Company’s purpose to collect, use, and/or disclose Personal Data, including to inform you of your rights as the data subjects. The contents are as follows:

1. Definitions

In this privacy policy, the following terms shall have the following meanings:

Terms	Definitions
1. The Humanica Group	Means Humanica Public Company Limited and its subsidiaries.
2. Subsidiaries	Means any entity that the Company controls, either by holding more than 50% of voting rights or by having the authority to manage its operations. The following link contains a list of company names: https://www.humanica.com/th/investors/general-information/company-structure/
3. Personal Data	Means information related to a natural person which can be used to identify such person whether directly or indirectly. This excludes information relating to deceased persons.
4. Sensitive Personal Data	Means Personal Data relating to nationality, race, political opinions, religious, philosophical, or spiritual beliefs, sexual behavior, criminal records, medical records, disability, trade union information, genetic data, biometric data (such as face scanning, iris scanning, or fingerprints) or other information which similarly impacts the data subjects as determined by the Personal Data Protection Committee.
5. Processing	Means the collection, usage, and/or disclosure of Personal Data.
6. Data Controller	Means a natural or juristic person who has the authority to decide on the issues relating to collection, usage, and disclosure of Personal Data.
7. Data Processor	Means a natural person or a juristic person who operates in relation to the collection, use, or disclosure of the Personal Data pursuant to the orders given by or on behalf of a Data Controller.
8. Website	Means website which the Humanica Group owns or provides services.

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2. Categories of Personal Data collected by the Humanica Group

The Humanica Group collects only Personal Data that is reasonably necessary for its activities. Personal Data that the Humanica Group collects includes, but is not limited to, the following:

Categories	Details
1. Identification	Such as name, last name, face portrait, gender, date of birth, age, nationality, passport number, identification card number, or other identification codes.
2. Contact Information	Such as address, phone number, email address, place of delivery for goods, place of delivery for invoice, LINE ID, and detail of contact person(s).
3. Financial Information	Such as details of salary, bank account, documents for submitting income tax, Personal Data as appeared on invoices, tax invoices, and receipts.
4. Work Information (Contact persons of the customers)	Such as job positions, work departments, professions, and information as appeared on business cards.
5. Personal Data as appeared on financial transaction documents or as shown in the Humanica Group's customer database	Such as information as appeared on an identification card, a copy of passport, a copy of house registration, and copies of other licenses, a copy of title deed, account opening requests, a power of attorney, a copy of affidavit, a copy of certificate of VAT registration (Por. Por. 20), purchase contracts or other contract relating to transactions, and delivery notes.
6. Sensitive Personal Data	Such as biometric data, fingerprints, face scans or face recognitions, religious beliefs, health information, ethnic, and criminal records. The Humanica Group has no policy to collect and store your Sensitive Data, except in the case where the Humanica Group has received explicit consent or is permitted by the law. Note The Humanica Group does not collect religious and blood group informations appearing on copies of ID cards. Please remove this information before submission; otherwise, the Humanica Group reserves the right to do so.
7. Record of Information	Audio/ voice recording and CCTV footages.

3. Source of Personal Data

- 3.1 The Humanica Group may obtain Personal Data directly from you. For instance, you may browse the Humanica Group's website and provide such Personal Data via the Humanica Group's website, or when you provide such Personal Data via prepared channels, such as phone calls, other of the Humanica Group's documents or forms, and communication applications. The Personal Data may also be directly obtained when you submit documents which contain Personal Data relating to you when you enter into a contract or a transaction with the Humanica

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Group, when you purchase goods or services from the Humanica Group, or when you submit opinions or request to the Humanica Group, and so on.

- 3.2 The Humanica Group may receive Personal Data from other sources, such as from the public authorities, business partners, or other reliable websites, and so on.

4. Purpose of Processing Personal Data

The Humanica Group has the following purposes and lawful basis for the collection, use, and/ or disclosure of Personal Data as follows:

Order	Purpose	Basis for Processing
1.	For analyzing marketing data, contacting, events and marketing news announcement, and offering personalized products and services to the targeted customers.	Consent (Section 24)
2.	For the purpose of fulfilling the contract between the customers and the Humanica Group, including to ensure that the Humanica Group's actions are in accordance with the contract.	Necessary for the performance of a contract (Section 24(3))
3.	For the purpose of procurement, registering new customers, or other persons with similar functions, including performing as per customers' requests.	Necessary for the performance of a contract (Section 24(3))
4.	For the purpose of recording the creditors and debtors of the Humanica Group, issuing of invoice, tax invoice, disbursement, receiving payment, including any financial transactions and transactions relating to the Humanica Group's account which involves the customers.	Necessary for the performance of a contract (Section 24(3))
5.	To provide consultation, services, and management planning for human resource technology systems and applications of the Humanica Group, including data processing and the resolution of related issues.	1. Necessary for the performance of a contract (Section 24(3)) 2. Legitimate Interest of the Humanica Group (Section 24(5))
6.	For the purpose of coordinating offers of products and services to the customers or persons related to the customers, in order for the Humanica Group to conclude the sales amount and proceed to the next procedure concerning sales of goods and services.	Necessary for the performance of a contract (Section 24(3))
7.	For the purpose of identification of such persons, and for such Personal Data to be used as evidence for training sessions and testing of goods and services.	Legitimate Interest of the Humanica Group (Section 24(5))
8.	For the purpose of customer evaluation of products and services, and to use such information to improve the Humanica Group's products and services to correspond with the customers' need.	Consent (Section 24)

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Order	Purpose	Basis for Processing
9.	For the purpose of customer satisfaction interview used for the Humanica Group marketing communication and promotional, including public relation relevant personal data through the Humanica Group communication channels. (Customer Testimonial)	Consent (Section 24)
10.	For the purpose of complying to relating laws, regulations, and legitimate official orders from officials and relating persons, such as filing tax reports to the Revenue Department, or internal or external accounting auditors.	Compliance with legal obligation (Section 24(6))
11.	For the purpose of recording information and evidence of the customers, or any outside persons who access the Humanica Group's internet networks.	Legitimate Interest of the Humanica Group (Section 24(5))
12.	For the purpose of handling complaints from customers, employees, or persons related to the customers.	Legitimate Interest of the Humanica Group (Section 24(5))
13.	For the purpose of monitoring and maintaining the security within the Humanica Group's premises, and for assessing security risk, including entering and leaving the premises of the Humanica Group. Examples include submitting cards for entering or leaving the premises, keeping records of entrance and leave, and recording video footages of the areas within the building and outside of the building via CCTV.	Legitimate Interest of the Humanica Group (Section 24(5))
14.	For the purpose of marketing analyzing, customer contacting, and offering interesting activities or marketing news to customer. These includes include offering health related articles, health products, and health insurance plans.	Consent (Section 26)
15.	For the purpose of establishment of legal claims, compliance, or exercise of legal claims, or defense of legal claims, or for prosecution and legal enforcement purposes.	Establishment of legal claims (Section 26(4))
16.	For the purpose of protecting public health from fatal contagious disease which may be contracted within the Humanica Group by screening persons who enter and leave the premises, and requiring a report of travels which may cause a spread of a disease.	Public Health (Section 26(5)(Khor))

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5. Disclosure of Personal Data

The Humanica Group shall only disclose your Personal Data under the informed purposes to individuals or agencies are as follows:

- 5.1 The Humanica Group may disclose your information to the employees of affiliated companies as necessary for the purpose of Processing the data on the basis which you have been previously informed;
- 5.2 Service provider who acts as a Data Processor which the Humanica Group has designated or hired for the purpose of managing or processing the data for the Humanica Group in various services, such as human resource management, security services, information technology services, or other services relating to the operation of the Humanica Group, or services which may benefit you;
- 5.3 Government agencies, regulators, or other agencies with legitimate power, including officials or responsible agencies with power or duties under the laws, such as the Revenue Department, Social Security Department, Department of Business Development, Personal Data Protection Committee, National Police Department, the courts, police departments, Bank of Thailand, and hospitals, and so on;
- 5.4 Suppliers, contractors, or contracting parties of the Humanica Group relating to the Humanica Group businesses;
- 5.5 State enterprises or private agencies, such as banks, financial institutions, insurance companies, and hospitals and so on;
- 5.6 The Humanica Group's consultants, such as external auditors, trainers or speakers, lawyers or legal consultants;
- 5.7 Other persons or agencies which you have given consent to disclose your Personal Data to.

6. Use of Personal Data in AI Systems

6.1 Personal Data Used in AI-Enabled Features

Where a customer uses an AI-enabled feature provided by The Humanica Group, The Humanica Group may process Personal Data as necessary to provide, operate, secure, and maintain the relevant feature.

Depending on the purpose and functionality of the feature, the Personal Data processed may include:

- General organizational information.
- General employee profile : onboarding, job assignment, career management, offboarding, qualifications, skills, performance, training, and employee career development information.
- Shift schedule, attendance, leave, overtime, benefits and expense, payroll, and compensation information.
- Questions, prompts, documents, instructions, and other content submitted by users.

Not every AI-enabled feature uses all categories of Personal Data listed above. The actual data processed will depend on the purpose, configuration, and use of the relevant feature.

Personal Data may be processed to provide employee self-service support, personalize services, support workforce planning and scheduling, generate workforce and career insights, verify identity and attendance, identify data anomalies, assist payroll and expense processing, and support related workflows and recommendations.

Where necessary, Personal Data may be disclosed to authorized service providers supporting the relevant feature, subject to appropriate privacy, security, confidentiality, and contractual requirements.

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AI-generated outputs may contain errors or limitations and should be reviewed before being used for decisions that may materially affect individuals.

6.2 Restrictions on the Use of Personal Data for AI

The Humanica Group will limit the Personal Data processed by each AI-enabled feature to what is reasonably necessary for its intended purpose. Personal Data processed for one feature will not be used for another unrelated purpose without appropriate authorization or another applicable legal basis.

The Humanica Group will not use Personal Data to train or improve general-purpose AI models or to develop AI products for unrelated customers.

Any additional use of Personal Data for AI development, training, testing, validation, or improvement will be subject to appropriate authorization and applicable legal and contractual requirements.

Personal Data processed through AI-enabled features will be retained only for as long as necessary for the relevant service purpose or as required by applicable legal, contractual, and retention requirements.

7. Retention Period in Storing Personal Data

The Humanica Group will collect your Personal Data for as long as necessary for the purposes which the Humanica Group has informed you, or other purposes listed on this policy. In the case where your relationship with the Humanica Group as the customer ends, or where services and transactions no longer occur between you and the Humanica Group, the Humanica Group will retain your Personal Data for the duration which the law has provided, in accordance with legal prescription, or for a period designated by public agencies, or for the purpose of establishing legal claims. After the expiration of the retention period of Personal Data, the Humanica Group shall proceed to erase, destroy, or make anonymize of such Personal Data.

8. Link to Third Parties Website Disclaimer

The Humanica Group's website may contain links to other websites owned by outside persons, and such persons may collect your data. The Humanica Group cannot be responsible for the safety and security of any Personal Data collected by other websites. You should examine the privacy policy of the websites and goods and services offered by such websites with utmost scrutiny.

9. The Rights of Data Subject

As a Data Subject, you have the rights to request the Humanica Group to use your Personal Data within the scope of the laws as follows:

- 9.1 You have the right to access your Personal Data and the right to request for a copy of your Personal Data being controlled by the Humanica Group or request the Humanica Group to inform any acquisitions of Personal Data in which consent has not been given;
- 9.2 You have the right to amend your Personal Data to make the information accurate, up-to-date, and not misleading. In the case where you foresee that such data is inaccurate, outdated, incomplete, or may cause misunderstanding;
- 9.3 You have the right to withdraw your consent given to the Humanica Group for the purpose of collecting, using, and disclosing your Personal Data at any moment, except in the case where such withdrawal is limited by the law, or a contract which benefits you, such as in the case where you are the Humanica Group's debtor or bound by any legal obligations towards the Humanica Group. In any case, your withdrawal of consent may make it impossible for you to receive services or engage in transactions with the Humanica Group, or may reduce the efficiency of the services to be received from the Humanica Group;

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- 9.4 You have the right to receive the Personal Data concerning yourself from the Humanica Group. In which the Humanica Group shall arrange such Personal Data to be in the format which is readable or commonly used by ways of automatic tools or equipment and can be used or disclosed by automated means. You are also entitled to request the Humanica Group to send or transfer the Personal Data in such formats to other Data Controllers if it can be done by the automatic means or entitled to request to directly obtain the Personal Data in such formats that the Humanica Group sends or transfers to other Data Controllers unless it is impossible to do because of the technical circumstances;
- 9.5 You have the right to object the Processing of your Personal Data at any moment in the following cases:
- (1) Such Personal Data is collected for the purpose of the Humanica Group's public tasks or for the Humanica Group's necessary legitimate interest;
 - (2) Such Personal Data is being used for the purpose of direct marketing; or
 - (3) Such Personal Data is being processed for the purpose of scientific, historic, or statistic study, except in the case where such Processing is done for the benefit of the Humanica Group's public task;
- 9.6 You have the right to request the Humanica Group to erase or destroy or anonymize Personal Data to be non-identifiable data in some cases;
- 9.7 You have the right to request the Humanica Group to temporarily restrict the use of your Personal Data in the following cases:
- (1) Where the Humanica Group is in the process of investigating in accordance with your request to amend your Personal Data;
 - (2) When such Personal Data which shall be erased or destroyed because it has been unlawfully collected, used, and/or disclosed, but you request for restriction of the use instead;
 - (3) When such Personal Data is no longer necessary for the Humanica Group to retain, but you have provided contrary intention for the Humanica Group to instead retain such data for the establishment, compliance, exercise or defense of legal claims; or
 - (4) In the case where you exercise your right to object the Processing of data and the Humanica Group is conducting an investigation to comply with your request; or
- 9.8 You have the right to lodge a complaint to the Personal Data Protection Committee under the Personal Data Protection law in the case where the Humanica Group, its employees, employers, or the Data Processors violate or fail to comply with the Personal Data Protection Act B.E. 2562.

In any case, the Humanica Group reserves the right to consider whether to comply with your requests and conduct the procedures under the Personal Data Protection Act B.E. 2562. If you wish to exercise your rights, you can proceed by downloading the Personal Data Owner Rights Request Form via [Data subject Right Management Form](#) and send it to the Data Protection Officer via **the contact channel in Clause 12**

10. Data Security Measures in Storing Personal Data

The Humanica Group recognized the importance of maintaining the security of your Personal Data. Therefore, the Humanica Group has designated a proper security measure for protecting your Personal Data to prevent loss, access, destruction, usage, modification, correction, or disclosure by unauthorized persons in order to comply with the policy and/or code of conduct in maintaining the Humanica Group's information security.

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The Humanica Group will organize a security measure for Personal Data, which encompasses management, technical, and physical measures in controlling the use of Personal Data. Such measures shall include at least the following conducts:

- 1) Implementing access control of the Personal Data and equipment used for storing and Processing Personal Data, with utmost consideration given to practical usage and security;
- 2) Determining permissions or right to access the Personal Data;
- 3) Managing the access of users in order to ensure that only authorized persons can access the Personal Data;
- 4) Establishing duties for users in order to prevent unauthorized access, disclosure, acknowledgement, or copy of Personal Data, including stealing of Personal Data storage equipment; and
- 5) Organizing a method for traceable access, modification, erasure, and transfer of Personal Data to be suitable for the methods and media under which the data has been collected, used, or disclosed.

11. Revision of Privacy Policy

This privacy policy is created for the purpose of informing details and methods to secure your Personal Data. The Humanica Group may occasionally partly or wholly modify this policy in accordance with changing laws, rules, and regulations. Thus, it is best that you keep yourself updated to any changes.

12. Contact Information

If you have any questions or wish to contact the Humanica Group for further information concerning the Processing of your Personal Data, including your rights as the data subject under this policy, or wish to report illegitimate use of your Personal Data, you may contact the Humanica Group via the following channels:

Humanica Public Company Limited	Address: 2 Soi Rong Mueang 5, Rong Mueang Road, Pathum Wan District, Bangkok, Thailand 10330 Email: marketing@humanica.com Phone No. 02 636 6999
Data Protection Officer	Address: 2 Soi Rong Mueang 5, Rong Mueang Road, Pathum Wan District, Bangkok, Thailand 10330 Email: dpo@humanica.com Phone No. 02 636 6999 # 1203