

Privacy Notice for Customer Bitkub Labs Co., Ltd.

Bitkub Labs Co., Ltd. (the “**Company**”) respects and recognizes the importance of your right of privacy and protection of your personal data and to ensure that your personal data is protected in accordance with the Personal Data Protection Act B.E. 2562, the Company has created this Privacy Notice to inform you the details and purposes of how the Company collects, uses, and discloses your personal data (collectively called “**Processes**” “**Processed**” or “**Processing**”) as follows.

1. Person whom the Company Processes personal data

Customer means the person as follows:

- 1) Natural person who purchases or will purchase products or uses or will use services from the Company or contact the Company for the information of products and services or receive the advertisement relevant to the Company’s products and/or services
- 2) Natural person who relevant to or being the representative of juristic person who use or will use the Product or contacts the Company for the information of the Product or receives the advertisement relevant to the Company’s Product such as executive, director, employee, agent, representative, or other related natural person who is a contact person, product or service receiver, person who act on behalf of juristic person, or person whose personal data shown on the relevant business document with the Company.

2. The personal data which the Company Processes

The Company processes various types of personal data which including but not limited to these personal data as follows:

- (a) **Identity data** such as name, surname, and a copy of national identification card
Remark: In general, the Company unintentionally Processes sensitive data which appear on your national identification card such as religious and blood type. In the event that you have to send a copy of your national identification card to us, please cover such data, if not, the Company may cover your sensitive data for your privacy and security reasons.
- (b) **Contact data** such as email, phone number, and address
- (c) **Social media data** such as Facebook account, Line ID, Instagram account, and YouTube account
- (d) **Technical data** such as Bitkub NEXT wallet address and Bitkub Exchange wallet address
- (e) **Transaction and finance data** such as payment slip and order number
- (f) **Activity participation data** such as a number of point from activity participation, a number of coin/token from activity participation, and a number of reward from activity participation
- (g) **Legal obligation data** such as police warrant and Take Down Notice document
- (h) **Service relevant data** such as student number and score
- (i) **Login and account details data** such as username, customer number, password (kept as hashing data), login data
- (j) **Bitkub NEXT’s KYC data** such as KYC status and personal data relevant to KYC process

3. Source of your personal data

Normally, the Company collects your personal data directly from you such as opening the account on Company's website or asking from you via contact data. However, in some case the Company may need to collect your personal data from other sources if it is necessary for compliance with a performance of the contract, legal obligation, or other necessary rights. In this regards, the Company may collect your personal data from these sources as follows:

- 1) When you connect Bitkub NEXT account or subscribe with the Company on Company's website, the Company shall collect your personal data from Bitkub Blockchain Technology Co., Ltd. for using to identity verification and account management.
- 2) When an organisation or third party is necessary to send your personal data to the Company for the performance of the contract or for the purpose of the legitimate interest that the organisation or third party has towards you or the purpose of the legitimate interest pursued by such organisation or third party.
- 3) When you participate in training course or in university class which the Company conducted or instructed, the Company may receive your personal data from your organisation where you are an employee or institution where you are a student for the purpose of contacting with you and verification process.

4. Processing of personal data

The Company processes your personal data under the legal bases or exceptions of the Personal Data Protection Act B.E. 2562 including for the performance of the contract and for the purpose of legitimate interest pursued by the Company or by a third party or by other stakeholders. Purchasing products or using the service, the Company may disclose some of your personal data to the third party for service operation. In this regard, the Company shall take the necessary measures to ensure that your personal data is disclosed, transmitted, and/or transferred only to the extent necessity and in accordance with the law.

The table of the purpose of the personal data Processing

Purpose of Processing	Type of personal data	Legal basis and exception	Disclosure or transfer to third party
Account Management and Service Providing			
Connecting Bitkub NEXT account on the Company's website	(b) Contact data (d) Technical data	For the performance of the contract	None
Subscription on the Company's website	(b) Contact data (d) Technical data (j) Bitkub NEXT's KYC data	For the performance of the contract	None

Purpose of Processing	Type of personal data	Legal basis and exception	Disclosure or transfer to third party
Opening account and login for purchasing product on online shopping platform	(a) Identity data (b) Contact data (i) Login and account details data	For the performance of the contract	None
Selling Products			
Selling products on online shopping platform and the exclusive rewards redemption from purchasing products	(a) Identity data (b) Contact data (e) Transaction and finance data	For the performance of the contract	<p>- The Company will disclose your name, surname, and contact data to parcel delivery service provider</p> <p>- The Company will disclose your name, surname, phone number, email, and Bitkub NEXT Wallet Address to the Company's business partner for Airdrop NFT in case when you get the exclusive reward from purchasing the product</p>
Providing customer service and customer feedback	(a) Identity data (b) Contact data (c) Social media data (only in case when you contact the Company via social media) (e) Transaction and finance data (only in case of the problem concerning payment)	For the performance of the contract	None
Reward Redemption and Activity Management			
Quiz participation and rewards redemption or receiving on the Company's social media	(a) Identity data (b) Contact data (c) Social media data (d) Technical data	For the performance of the contract	- The Company will disclose your personal data to Bitkub Blockchain Technology Co.,

Purpose of Processing	Type of personal data	Legal basis and exception	Disclosure or transfer to third party
platform (AMA Live Session)	(f) Activity participation data (j) Bitkub NEXT's KYC data		Ltd. and/or Bitkub Online Co., Ltd. in case that you receive the digital currency for Airdrop coin or token for you - The Company will disclose your name, surname, contact data, and order number to parcel delivery service provider
Reward redemption with points on the Company's website	(a) Identity data (b) Contact data (d) Technical data (f) Activity participation data (j) Bitkub NEXT's KYC data	For the performance of the contract	The Company will disclose your name, surname, contact data, and order number to parcel delivery service provider
Participating in Learn to Earn – Pop Quiz on the Company's website	(d) Technical data (f) Activity participation data	For the performance of the contract	None
Participating in Learn to Earn – Main Quiz for subscription customer on the Company's website	(d) Technical data (f) Activity participation data (j) Bitkub NEXT's KYC data	For the performance of the contract	None
Conducting General Knowledge Training and Instructing in University Class			
Training registration and issuing the electronic certification for training participation	(a) Identity data (b) Contact data	For the performance of the contract	In case when you participate the training which the Company conduct under the organisation or university where you are the employee or student, the Company will disclose your

Purpose of Processing	Type of personal data	Legal basis and exception	Disclosure or transfer to third party
			personal data to such organisation or institution for the benefit of the organisation or institution operating in the relevant section
Payment and issuing tax invoice	(a) Identity data (b) Contact data (e) Transaction and finance data	For the performance of the contract	The Company disclose your name, surname, contact data, and payment slip to the Company's accounting service provider for issuing tax invoice for you
Knowledge evaluation and scoring for university student	(a) Identity data (h) service relevant data	For the performance of the contract	The Company will transmit your identity data and score to your instructor for evaluate your academic performance
Coordination of training participating and sending student score and electronic certification	(a) Identity data (b) Contact data	For the performance of the contract	None
Marketing and Communication from Company			
Sending communication email from the Company to notify customer's rights and privileges	(b) Contact data	Legitimate interest	None
Sending communication email from the Company for the benefit of the performance of the contract	(b) Contact data	For the performance of the contract	None
Sending email to presenting Company's products and services (direct marketing)	(b) Contact data	Consent	None

Purpose of Processing	Type of personal data	Legal basis and exception	Disclosure or transfer to third party
Take Down Notice and Complaint Management			
Take Down Notice management or notification of inappropriate content according to the announcement of the Ministry of Digital Economy and Society	(a) Identity data (b) Contact data (g) Legal obligation data	- For compliance with a legal obligation - Legitimate interest	None
Internal Management			
Internal audit, complaint management, and prevention of corruption for good internal governance and to ensure transparency and to comply with a legal obligation	(a) Identity data (b) Contact data (e) Transaction and finance data (g) Legal obligation data	- For compliance with a legal obligation - Legitimate interest	Relevant government office (if any)

Remark: In case that you refuse the Company to Process your personal data which is necessary for the performance of the contract or to compliance with the legal obligation, the Company may be unable to provide the service for you.

5. Sending or transferring your personal data to foreign country

- 5.1. The Company may transmit or transfer your personal data to foreign country only with your explicit consent or where it is necessary for the Company to comply with the legal obligation, or for the performance of the contract which you are a party, or the performance of a contract between the Company and another person or juristic person for the benefit of you.
- 5.2. The Company stores your personal data on servers or cloud computing provided by third party located abroad. In this regard, the Company undertakes to ensure that the service provider has adequate personal data security safeguards.
- 5.3. The Company shall comply with the persona data protection laws and take necessary actions to ensure that your personal data which is sent or transferred to foreign country is adequately protected.

6. Personal data retention period

The Company stores your personal data only for the period necessary to achieve with the purposes notified above, to comply with the contract and founding laws, or to exercise legal claims and for the legitimate interests of the Company or other stakeholders as set out in the Company's personal data retention policy. The Company shall delete or destroy your personal data or make it anonymous when it is no longer necessary in relation to the purpose for which it was processed or when the period specified in the retention policy ends.

7. Security measures

The Company values the security of your personal data. In this regard, the Company has put in place appropriate security, technical, and administrative measures to ensure that your personal data is not accessed, modified, changed, deleted, or destroyed by any unauthorized person. A review of such measures is organized when necessary or when the technology changes to ensure that data security is always effective.

8. Exercising your rights as a data subject

You can exercise the right which you have under the legal basis set out in the Personal Data Protection Act B.E. 2562, relevant law, notice, and regulation including:

- 8.1. **Right to withdraw consent:** You have the right to withdraw the consent to data Processing which you have given to the Company at any time as long as your personal data is stored with the Company unless there is a legal limitation or there is a contract between you and the Company that benefit you.
- 8.2. **Right to access your personal data and request to disclose the source of your personal data:** You have the right to access your personal data which we collected, used, and disclosed and have the right to request the Company to disclose the source of your personal data.
- 8.3. **Right to ratification:** You have the right to request the Company to rectify your personal data if it is inaccurate or incomplete.
- 8.4. **Right to erasure your personal data or anonymize data:** You have the right to request the Company to erase, destruct, or anonymize your personal data if your personal data is no longer necessary in relation to the purposes in which it was collected.
- 8.5. **Right to restriction of Processing your personal data:** You have the right to request the Company to restrict the Processing of your personal data temporarily when the Company is in the process of investigating your request to ratification and/or objection or any other event where your personal data is no longer necessary in use and the Company must erase or destruct your personal data in accordance with the relevant law but you oppose such erasure and request the restriction of the use instead.
- 8.6. **The right to data portability in the form of automated mean:** You have the right to request to transmit your personal data to another data controller if the processing is carried out by automated means unless technical conditions do not allow. However, the Company does not yet have a system to support the exercise of such right.
- 8.7. **The right to object the processing:** You have the right to object the data Processing in some event.

However, you may not be able to exercise your rights or some exercise may appear to cost you if your request is in the scope of the following:

- 1) It is contrary to or inconsistent with the right set forth in Personal Data Protection Act B.E. 2562, applicable law, or relevant notice;
- 2) It is contrary to law or the court order;
- 3) It effects to the right and freedom of other people;
- 4) It is the dishonest, redundant, or unreasonable exercise of right; or
- 5) It influences the investigation exercise of judicial rights or court proceedings, etc.

You can exercise your right by complete the data subject right form and send to the email academy@bitkub.com

You can read the guideline for exercising the right and download the data subject right form via

https://www.bitkubacademy.com/th/company/legal-and-privacy?tab=SUBJetc_RIGHT

Please note that the exercise of right mentioned above may lose you some benefit or privilege from the Company's service.

9. Notification of changes

The Company value the respect of your privacy and the accuracy of your personal data. If your Personal Data has changed, please inform the Company immediately.

10. Right to investigate and file a claim

In the event that you find that the the Company has incorrectly Processed your personal data or that the personal data breach has occurred, you have the right to complain to the committee which is responsible for considering the complaint under the Personal Data Protection Act B.E.2562 or claim a lawsuit and request to investigate the action that violates personal data according to the rights that you have according to the law.

11. Contact details

- **Bitkub Labs Co., Ltd.** 2525 FYI Center Building 2, 11th Floor, 2/1101-2/1107 Units, Rama IV Road, Klong Toei Sub-district, Klong Toei District, Bangkok 10110 Tel. 02-032-9530 email: academy@bitkub.com
- **Data Protection Officer** 2525 FYI Center Building 2, 11th Floor, 2/1101-2/1107 Units, Rama IV Road, Klong Toei Sub-district, Klong Toei District, Bangkok 10110 email: dpo_ba@bitkub.com

This privacy notice was updated on 22 November 2024