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## Privacy Notice for Customer Bitkub Labs Co., Ltd.

Bitkub Labs Co., Ltd (“Company”) respects and recognises the importance of the right of privacy and the protection of your personal information and to make your personal information protected in accordance with the Personal Data Protection Act B.E.2562 law, this Privacy Notice has therefore created and published in order to inform you regarding the collection, use and disclosure of personal information (collectively, "Processing").

### 1. Person whom the Company collect personal information

**Customer** means natural person following:

- (1) person who buy or will buy products or use 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) person who relevant to or representative of juristic person whom buy or will buy products or use or will use 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 information shown on the relevant business document with the Company.

### 2. Personal information which the Company collects, uses, and discloses

The Company collects, uses, and discloses various types of personal information which can be divided as follows:

- (a) **Identity information** such as name, surname, and a copy of identification card  
Remark: In general, the Company unintentionally collects and uses sensitive information which appear on your identification card such as religious and blood type. In the event where you must send a copy of your identification card to us, please cover such information, if not, we may cover your sensitive information for your privacy and security reasons.
- (b) **Contact information** such as email, phone number, and address
- (c) **Social media account information** such as Facebook account, Line ID, Instagram account, and YouTube account

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- (d) **Transaction and finance information** such as payment slip, order number, Bitkub NEXT Wallet Address, and Bitkub Exchange Wallet Address
- (e) **Activity participation information** 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
- (f) **Legal obligation information** such as police warrant and Take Down Notice document
- (g) **Service relevant information** such as student number and score
- (h) **Login and account details information** such as username, customer number, password(kept as hashing data), login data
- (i) **Bitkub NEXT’s KYC status information**

**The table of purpose of use and disclose or transfer personal information to third party**

The purpose of processing	Type of information	Legal bases and exception	Disclosure or transfer to third party
<b>Account management and service providing</b>			
Opening account, login, and subscription on Bitkub Academy website	(b) Contact information (d) Transaction and finance information (h) Login and account details information (i) Bitkub NEXT’s KYC status information	For the performance of the contract	None
Opening account and login for buying product and academic course on online shopping platform	(a) Identity information (b) Contact information (h) Login and account details information	For the performance of the contract	None

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The purpose of processing	Type of information	Legal bases and exception	Disclosure or transfer to third party
<b>Selling products and academic courses</b>			
Selling products and academic courses on online shopping platform and the exclusive rewards redemption from buying products	(a) Identity information (b) Contact information (d) Transaction and finance information	For the performance of the contract	- The Company will disclose your name, surname, and contact information to parcel delivery service provider - 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 buying the product
Providing customer service and customer feedback	(a) Identity information (b) Contact information (c) Social media account information(in case when you contact the Company via social media) (d) Transaction and finance information (only in case of the problem concerning payment)	For the performance of the contract	None

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The purpose of processing	Type of information	Legal bases and exception	Disclosure or transfer to third party
<b>Reward redemption and activity management</b>			
Quiz participation and rewards redemption/ receiving on Company's website and social media platform	(a) Identity information (b) Contact information (d) Transaction and finance information (e) Activity participation information (i) Bitkub NEXT's KYC status information (only in case when you attend the activity on the Company's website)	For the performance of the contract	- The Company will disclose your personal information to Bitkub Blockchain Technology Co., Ltd. and 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 information, and order number to parcel delivery service provider
Participation in activity of giving coin and token as a reward for subscription customer (Learn to Earn)	(d) Transaction and finance information which is Bitkub Next Wallet (e) Activity participation information	For the performance of the contract	None
<b>Conducting general knowledge training and instructing in university class</b>			
Training registration and issuing the electronic certification for	(a) Identity information (b) Contact information	For the performance of the contract	In case when you participate the training which the Company conduct

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The purpose of processing	Type of information	Legal bases and exception	Disclosure or transfer to third party
training participation			under the organisation or university where you are the employee or student, the Company will disclose your personal information 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 information (b) Contact information (d) Transaction and finance information	For the performance of the contract	The Company disclose your name, surname, contact information, 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 information (g) service relevant information	For the performance of the contract	The Company will transmit your identity information and score to your instructor for evaluate your academic performance

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Coordination of training participating and sending student score and electronic certification	(a) Identity information (b) Contact information	For the performance of the contract	None
<b>Marketing and communication from Company</b>			
Sending communication email from the Company to notify customer's rights and privileges	(b) Contact information	Legitimate interest	None
Sending communication email from the Company for the benefit of the performance of the contract	(b) Contact information	For the performance of the contract	None
Sending email to presenting Company's products and services (direct marketing)	(b) Contact information	Consent	None
<b>Take down notice and complaint management</b>			
Take Down Notice management or notification of inappropriate	(a) Identity information (b) Contact information	- For compliance with a legal obligation - Legitimate interest	None

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The purpose of processing	Type of information	Legal bases and exception	Disclosure or transfer to third party
content according to the announcement of the Ministry of Digital Economy and Society	(f) Legal obligation information		
<b>Internal management</b>			
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 information (b) Contact information (d) Transaction and finance information (f) Legal obligation information	- For compliance with a legal obligation - Legitimate interest	Relevant government office (if any)

### 3. Sending or transferring your personal information to overseas

- (1) The Company may transmit or transfer your personal information to overseas only with the explicit consent or where it is necessary for us to comply with the legal obligation, or for the performance of a contract to which you are a party, or the performance of a contract between the Company or its affiliates and another person or juristic person for the benefit of the owner of the personal information (the data subject).
- (2) The Company stores your personal information 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 information security safeguards.
- (3) The Company will comply with the personal information protection laws and take the necessary actions to ensure that your personal information which is sent or transferred to overseas is adequately protected.

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#### **4. Source of personal information**

Normally, the Company collects your personal information directly from you such as opening the account on Company's website or asking from you via contact information. However, in some case the Company may need to collect your personal information 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 information as follows:

1. When you open the account or subscription with the Company via connecting Bitkub NEXT Wallet on Company's website, the Company will collect your contact information, wallet address, and Bitkub NEXT's KYC status 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 information 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 you or by such organisation or third party such as when you participate in training.
3. The Company may receive your personal information from your organisation where you are an employee or institution where you are a student when you participate in training course or in university class which the Company conducted or instructed for the purpose of contacting with you and verification process.

#### **5. Personal information storage time period**

The Company will store your personal information 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 information retention policy. The Company will delete or destroy the personal information or make it anonymous when the personal information is no longer necessary in relation to the purpose for which it was collected or processed or when the period specified in the retention policy ends.

#### **6. Personal information security measures**

The company values the security of your personal information. The company has put in place appropriate security, technical and administrative measures to ensure that

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your personal information 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 information security is always effective.

## 7. 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:

- 7.1. 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 information is stored with us unless there is a legal limitation or there is a contract between you and the Company and/or its affiliates that benefit you.
- 7.2. Right to access your personal information and request to disclose the source of your personal information:** You have the right to access your personal information which we collected, used, and disclosed and have the right to request us to disclose the source of your information.
- 7.3. Right to ratification:** You have the right to request us to rectify your personal information if it is inaccurate or incomplete.
- 7.4. Right to erasure your personal information or anonymize information:** You have the right to request us to erase, destruct or anonymize your personal information if your personal information is no longer necessary in relation to the purposes in which they were collected.
- 7.5. Right to restriction of processing your personal information:** You have the right to request us to restrict the processing of your personal information temporarily when we are in the process of investigating your request to information ratification and/or objection or any other event where your personal information is no longer necessary in use and we must erase or destruct your personal information in accordance with the relevant law but you oppose such erasure and request the restriction of the use instead.
- 7.6. The right to information portability in the form of automated mean:** You have the right to request to transmit your personal information to another data controller if the processing is carried out by automated means unless technical conditions do not allow. However, we do not yet have a system to support the exercise of such rights.



**7.7. 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 right 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 has an effect on the investigation exercise of judicial rights or court proceedings, etc.

Please note that the exercise of right mentioned above may lose you some benefit or privilege from our products and services

You can exercise your right by complete the data subject right form and send to the email [academy@bitkub.com](mailto: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](https://www.bitkubacademy.com/th/company/legal-and-privacy?tab=SUBJETC_RIGHT)

**8. Notification of changes**

The Bitkub Group Companies value the respect of your privacy and the accuracy of your personal information. If your personal information has changed, please inform the Company and/or its affiliates immediately.

**9. Right to investigate and file a claim**

In the event that you find that the Bitkub Group Companies has incorrectly processed your personal information or that the personal information breach has occurred, you have the right to complain to the expert committee which is responsible for considering the complaint under the Personal Data Protection Act B.E.2562 or claim



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a lawsuit and request to investigate the action that violates personal information according to the rights that you have according to the law.

#### 10. 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](mailto:academy@bitkub.com)
- **Data Protection Officer:** 2525 FYI Center Building 2, 11th Floor, 2/1101-2/1107 Units, Rama IV Road, Klongtoey Sub-district, Klongtoey District, Bangkok 10110 email [dpo\\_ba@bitkub.com](mailto:dpo_ba@bitkub.com)

This Privacy Notice is updated on 29 January 2024