



บริษัท บิทคับ แล็บส์ จำกัด
Bitkub Labs Co., Ltd.

2525 อาคารเอฟวายไอ เซ็นเตอร์ ตึก 2 ชั้นที่ 11 ยูนิต 2/1101-2/1107 ถนนพหลโยธิน แขวงคลองเตย เขตคลองเตย กรุงเทพมหานคร 10110
2525, FYI Center, Tower 2, 11th floor, Unit 2/1101-2/1107, Rama 4 Road, Klongtoei Sub-district, Klongtoei District, Bangkok 10110

Privacy Notice for Vendor and Business Partner Bitkub Labs Co. LTD.,

Bitkub Labs Co., Ltd (“Company”) respects and recognizes 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 we collect personal information

- 1.1. **Vendors** means neutral person who sell, will sell and/or provide or will provide service to the Company also including neutral person relevant to or representative of juristic person which is the Company’s vendor and its employee, representative, or authorized person who collect personal information for contact or enter into transaction with the Company.
- 1.2. **Business partner** means neutral person who is not the Company’s customer or vendor but relevant to the Company’s business such as business partner, regulator of the government office also including the representative or authorized person of juristic person which is the Company’s business partner.

2. Personal information which we collect, use, and disclose

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

- (1) **Identity information** such as name, surname, identification number, copy of identification number, passport number, and taxpayer identification number.

Remark: In general, the Company unintentionally collects and



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uses sensitive information which appear on your identification card such as religious and blood type. In the event where you must send the copy of your identification card to us, please cover such information, if not, we may cover your sensitive information for your privacy and the security reasons.

(2) Contact information such as address, office address, phone number, and email.

(3) Photo and video such as photo or video from camera, video recorder, and CCTV.

(4) Transaction and finance information such as transaction history and bank account number.

(5) Job position and responsibility such as job position, responsibility, and your company's name

(6) Capability and appropriation of service assessment

The Company collects, uses, and discloses your personal information under legal bases or exception according to Personal Data Protection Act B.E. 2562 for the purpose of performance of contracts, compliance with legal obligation, legitimate interest pursued by the Company or by third party or other stakeholders, and for public interest and vital interest.

In this regard, we may disclose or transfer your personal information to third party and we will take steps to ensure that such disclosure is processed under legal bases and having the appropriate personal information protection measures.



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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
For contact	(1) Identity information (2) Contact information (3) Job position and responsibility	- For the performance of the contract - Legitimate interest	None Affiliated companies
For any processing necessary for or prior to entering into a contract or a transaction	(1) Identity information (2) Contact information (3) Job position and responsibility Work and job information Company and job information	- For the performance of the contract - Legitimate interest	- the Company's legal consultant
For products and services payment and for the Company's imbursement	(1) Identity information (2) Contact information (3) Job position and responsibility	- For the performance of the contract - For compliance with a legal obligation	- the Company's accounting service provider - Relevant government office such as auditor and the Revenue Department



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The purpose of processing	Type of information	Legal bases and exception	Disclosure or transfer to third party
Conducting the processes of service provider selection	(1) Identity information (2) Contact information (3) Transaction and finance information (4) Job position and responsibility (5) Capability and appropriation of service assessment	- For the performance of the contract - Legitimate interest	None
For internal audit, control, and complaints investigation as well as the corruption prevention and for compliance with the legal obligation.	(1) Identity information (2) Contact information (3) Transaction and finance information (4) Job position and responsibility (5) Capability and appropriation of service assessment	- For the performance of the contract - For compliance with a legal obligation	- Company's internal control and audit service provider - Regulatory office such as the Securities and Exchange Commission (SEC) and Anti Money Laundering Office (AMLO)
For maintaining perimeter security	(1) Photo and video (from CCTV)	Legitimate interest	None



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The purpose of processing	Type of information	Legal bases and exception	Disclosure or transfer to third party
To store information on cloud storage platform for security reason and information backup	(1) Identity information (2) Contact information (3) Photo and video (4) Transaction and finance information (5) Job position and responsibility (6) Capability and appropriation of service assessment	- For the performance of the contract - Legitimate interest	Cloud computing service provider

Remark: If you refuse the Company to collect, use, and disclose any personal information which is necessary for the performance of contract or for the compliance with a legal obligation, the Company may not be able to provide service to you.

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



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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.

4. Source of personal information

Normally, the Company will collect your personal information directly from you. However, in some cases, the Company may need to collect your personal information from other sources if it is necessary for compliance with a legal obligation, performance of a contract and for the purpose of legitimate interest pursued by the Company or by a third party or other stakeholders.

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 your personal information is not accessed, modified, changed, deleted or destroyed by any unauthorized person. A review of such measures is organized when



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necessary or when the technology changes to ensure that information security is always effective.

7. Exercising your rights as an information owner

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



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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 via



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https://www.bitkubacademy.com/en/company/legal-and-privacy?tab=SUBJECTC_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 finds 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 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 Capital Group Holdings Co. LTD.**, 2525 FYI Center Building 2, 11th Floor, 2/1101-2/1107 Units, Rama IV Road, Klongtoey Sub-district, Klongtoey District, Bangkok 10110 Tel. 02-032-9533 email academy@bitkub.com
- **Data Portection 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_bcgh@bitkub.com

BA privacy Notice for Vendor Version 1.0



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This Privacy Notice is updated on 24 July 2023