

## **Privacy Notice for Bitkub NEXT User Bitkub Blockchain Technology Co., Ltd.**

Bitkub Blockchain Technology 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**

**User means** the person as follows:

- 1) Natural person who uses or will use Bitkub NEXT (“**Product**”) or contact the Company for the information of the Product or receives the advertisement relevant to the Company’s Product.
- 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 information shown on the relevant business document with the Company.
- 3) Natural person who has the authority to grant permission, consent or provide any certification necessary to enable the Company's customers who are legally incapacitated to use the Company's Product as specified in the Company's Terms of Service or is a person who must act on behalf of or jointly with such incapacitated person in exercising their rights under applicable law, such as a parent or guardian giving consent together with a minor.

### **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, middle name, surname, date of birth, nationality, gender, DOPA status, passport number, expiration date of passport, national identification number, national identification card laser number, issuing date of national identification card, expiration date of national identification card, data comparison result, and photo comparison result
- (b) **Family status data** such as a copy of marriage certificate, a copy of divorce certificate, a copy of court order of marriage status
- (c) **Minor verification data** such as parent’s name, a copy of house certificate, a copy of adoption certificate, a copy of court order of parental status, a copy of document from state of citizenship, and parental verification document
- (d) **Photo and video data** such as personal photo and your photo with verification document
- (e) **Contact data** such as email, phone number, and address

- (f) **Technical data** such as Wallet address, password, PIN code, NFT profile picture, KUB profile, client ID
- (g) **Transaction and finance data** such as transaction
- (h) **Service relevant data** such as verification status, biometric status, token data, NFT data, activity participation data, Airdrop reward status, lock KUB status, email connection status, PIN code status, order number, and package data
- (i) **Sensitive data** such as biometric data
- (j) **Contract relevant document** such as power of attorney, Copy of Affidavit, Certificate of Incorporation, and Memorandum of Association
- (k) **Legal obligation data** such as police warrant, valid subpoena, court order, and binding order of a government authority

### 3. Source of your personal data

The Company collects your personal data from various source for the necessary for compliance with a performance of the contract, legal obligation, and for the purpose of legitimate interest pursued by the Company or by a third party or other stakeholders. In this regard, the Company collects your personal data from these source as follows:

- 1) The Company collects your personal data directly from you when using the Product’s application or website including when you contact us via the contact channels such as email, phone, and social media
- 2) The Company collects your personal data from the affiliated company of Bitkub group company when they necessary to send your personal data to the Company for the performance of the contract
- 3) The Company collects your personal data from the government authority

### 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. 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
<b>User’s account management</b>			
Bitkub NEXT account registration and logging in to Bitkub NEXT account	(e) Contact data (f) Technical data	For the performance of the contract	None
Changing Bitkub NEXT password	(e) Contact data (f) Technical data	For the performance of the contract	None
Displaying profile	(e) Contact data (f) Technical 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
	(h) Service relevant data		
Changing email and phone number	(a) Identity data (d) Photo and video data (e) Contact data (f) Technical data	For the performance of the contract	None
Suspension and unsuspension Bitkub NEXT account	(a) Identity data (f) Technical data	For the performance of the contract	None
Know Your Customer (KYC) process	(a) Identity data (b) Family status data (c) Minor verification data (d) Photo and video data (e) Contact data (i) Sensitive data	- For the performance of the contract  - Your consent (only for sensitive data)	The Company discloses your personal data to the KYC process service provider
Know Your Business (KYB) process	(a) Identity data (e) Contact data (j) Contract relevant data	Legitimate interest	None
Parental verification in giving or withdrawing consent of minor	(a) Identity data (c) Minor verification data	Legitimate interest	None
<b>Providing service</b>			
Transferring token to Bitkub NEXT account	(e) Contact data (f) Technical data (g) Transaction and finance data (h) Service relevant data	For the performance of the contract	None
Transferring token to account except Bitkub NEXT	(f) Technical data (g) Transaction and finance data (h) Service relevant data	For the performance of the contract	None
Transferring NFT via Bitkub NEXT account	(e) Contact data (g) Transaction and finance data (h) Service relevant data	For the performance of the contract	None
Airdrop receiving via Bitkub NEXT	(f) Technical data (h) Service relevant 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
Transferring and connecting data via Open Authorization (OAuth) technology	(a) Identity data (e) Contact data (f) Technical data (h) Service relevant data	For the performance of the contract	The Company transfer your personal data to the business partner for activating the service via API
Transferring Coin and/or Token from Bitkub NEXT wallet to lock in smart contract	(f) Technical data (g) Transaction and finance data (h) Service relevant data	For the performance of the contract	None
Setting NFT profile on Bitkub NEXT account	(f) Technical data	For the performance of the contract	None
Locking KUB for receiving reward from KUB to the Mars activity	(f) Technical data (g) Transaction and finance data (h) Service relevant data	For the performance of the contract	None
Locking KUB for receiving reward from Dropzone activity	(f) Technical data (g) Transaction and finance data (h) Service relevant data	For the performance of the contract	The Company discloses your personal data to business partner for the purpose of analyzing the activity participation
Loyalty reward redemption	(f) Technical data (g) Transaction and finance data (h) Service relevant data	For the performance of the contract	The Company discloses your personal data to business partner for the purpose of analyzing the activity participation
Promotion code reward redemption	(f) Technical data (g) Transaction and finance data (h) Service relevant data	For the performance of the contract	The Company discloses your personal data to business partner for the purpose of analyzing the activity participation
Recording the wallet address in Bitkub NEXT, Bitkub Exchange, and other Wallet transaction	(f) Technical data (g) Transaction and finance data (h) Service relevant 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
<b>Providing the service of Checkout Service</b>			
Logging in to use Checkout Service via Bitkub NEXT OAuth	(f) Technical data (g) Transaction and finance data (h) Service relevant data	- For the performance of the contract - Legitimate interest	None
Service payment	(f) Technical data (g) Transaction and finance data (h) Service relevant data	- For the performance of the contract - Legitimate interest	None
<b>Company's communication</b>			
Organizing campaigns or activities through social media such as Facebook, Google Form and delivering rewards to User	(a) Identity data (e) Contact data (f) Technical data	For the performance of the contract	None
Tax procedures in case that you receiving the reward worth more than 1,000 baht	(a) Identity data (e) Contact data	For compliance with the legal obligation	The Company may disclose your personal data to the Revenue Department
Sending the direct marketing via email	(e) Contact data (h) Service relevant data	Your consent	The Company discloses your email to the Marketing Service Provider to deliver marketing information to you
Organizing an event including - registration - reward delivery - collecting feedback on event	(a) Identity data (e) Contact data (f) Technical data (h) Service relevant data	- For the performance of the contract - Legitimate interest	The Company discloses your personal data to the parcel delivery service provider to send you the parcel
<b>Complaints management</b>			
Receiving Product's issue via live chat	(a) Identity data (f) Technical data (h) Service relevant data	For the performance of the contract	None
Managing disputes or lawsuits related to customer accounts	(a) Identity data (e) Contact data (e) Service relevant data (k) Legal obligation data	Legitimate interest	The Company may disclose to police office regarding to the police warrants

Purpose of Processing	Type of personal data	Legal basis and exception	Disclosure or transfer to third party
Take down notice management or notification in case of inappropriate content according to the announcement of the Ministry of Digital Affairs	(a) Identity data (e) Contact data (e) Service relevant data (j) Contract relevant data (k) Legal obligation data	- For compliance with the legal obligation - Legitimate interest	None
<b>Internal management</b>			
Internal audit, complain management, and corruption prevention for good governace and also for complying with the law (in the event that you have Bitkub NEXT account)	(a) Identity data (e) Contact data (g) Transaction and finance data (k) Legal obligation data	- For compliance with the legal obligation - Legitimate interest	The Company may disclose to official organization in the event of the order from organisation to access to personal data
Investigating customer's problem caused by system errors	(a) Identity data (e) Contact data (f) Technical data	For the performance of the contract	None
System and service testing in case that issue occurs	(a) Identity data (e) Contact data (f) Technical data	Legitimate interest	None

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 not 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 information 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 via

- Live chat on the Company's website as follows:  
<https://www.bitkubchain.com/>  
<https://developers.bitkubchain.com/>  
<https://www.bitkubnft.com/>  
<https://studio.bitkubnft.com/>
- Email: [bitkubchain@bitkub.com](mailto:bitkubchain@bitkub.com)
- Facebook: <https://www.facebook.com/bitkubchainofficial>

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 Blockchain Technology 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. 02-032-9533 email: [bitkubchain@bitkub.com](mailto:bitkubchain@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\\_bbt@bitkub.com](mailto:dpo_bbt@bitkub.com)

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