

Privacy Notice for POS Staking Platform 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

- 1.1. **Validator** means a natural person who registers or will register Bitkub Chain Proof-of-Stake Staking Decentralized Application (“**POS Staking dApp**”) from the Company to become a validator with Bitkub Chain Blockchain for the reward from the duty performing. The Proof-of-Stake or PoS consensus system will randomly select the validator. In this regard, the validator who has a larger amount of KUB coin as collateral will have a greater opportunity to be selected for such duty. This also means natural person who contact for information or receive the advertisement about the PoS Staking dApp from the Company.
- 1.2. **Delegator** means a natural person who registers or will register the POS Staking dApp for participation with the Validator to jointly deposit KUB coin as collateral to increase the number of the Validator’s KUB coin collateral and increase the opportunity to be selected for being Validator. When the Validator successfully perform the duty, it will receive KUB coin as a reward and such reward will be proportionally shared to the Delegator. This is also mean a natural person who contact for information or receive the advertisement about POS Staking dApp from the Company.
- 1.3. A natural person relevant to or representative of a juristic person who is the Company’s customer, for instance, director, employee, representative, contact person, or person whose personal information appears on documents relevant to any transaction or service of 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, nation identification number, passport number, signature, a copy of identification card, and a copy of passport
- (b) **Contact data** such as address, phone number, and email
- (c) **Technical data** such as Wallet Address and Signer Address
- (d) **Transaction and finance data** such as transaction history, the amount of staking KUB
- (e) **Service relevant data** such as type of Wallet, node information, profile name, and profile picture
- (f) **Legal obligation data** such as police warrant, valid subpoena, court order, or binding order of a government authority

3. Source of your personal data

Normally, the Company collects your personal data directly from you. 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, and for the purpose of legitimate interest pursued by the Company or by a third party or other stakeholders.

4. The 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
Account management and providing service			
KUB staking as the Validator	(a) Identity data (c) Technical data (d) Transaction and finance data (e) Service relevant data	- For the performance of the contract - Legitimate interest	None
KUB staking as the Delegator	(c) Technical data (d) Transaction and finance data (e) Service relevant data	- For the performance of the contract - Legitimate interest	None
Internal management			
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 (b) Contact data (d) Transaction and finance data (f) Legal obligation data	- For compliance with a legal obligation - Legitimate interest	The Company may disclose to official organization in the event of the order from organization to access to personal data
Investigating user's problem caused by system errors	(a) Identity data (b) Contact data (c) Technical data	For the performance of the contract	None
System testing	(a) Identity data (b) Contact data (c) 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 personal 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
- 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
- **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

This privacy notice was updated on 16 October 2024