



**Privacy Notice
for Marketing Promotion and
Corporate Social Responsibility (CSR) Events
Bitkub Capital Group Holdings Co., Ltd.**

Bitkub Capital Group Holdings Co., Ltd. (the “**Company**”) and its affiliates (collectively referred to as the “**Bitkub Group Company**”) respect and recognize the importance of the right of privacy and the protection of your personal data and to make your personal data 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 your personal data (collectively called “**Processing**”) for marketing promotion and corporate social responsibility (CSR) events (collectively called “**Events**”).

1. Person whom the Company collects, uses, and discloses personal data.

“**Event Participant**” means person as follows:

- (1) Natural person who participates, will participate, or receive the information relate to the Events organized by the Company or by the Bitkub Group Company.
- (2) Natural person who relevant to or represent the juristic person such as director, employee, and representative who participate, will participate, or receive the information relate to the Events organized by the Company or by the Bitkub Group Company.

2. Enforcement scope of this privacy notice

This privacy notice applies to Event Participant who participate in the Events organized by the Company and/or Bitkub Group Company.

Therefore, the Bitkub Group Company means the company as follows:

1. Bitkub Capital Group Holdings Co., Ltd.
2. Bitkub Labs Co., Ltd.
3. Bitkub Blockchain Technology Co., Ltd.
4. Bitkub Ventures Co., Ltd.
5. Bitkub Infinity Co., Ltd.
6. Bitkub Moonshot Co., Ltd.
7. Bitkub Worldtech Co., Ltd.
8. Bitkub Advisory Co., Ltd.
9. Bitkub Custody Co., Ltd.
10. Bitkub Portal Co., Ltd.

บริษัท บิทคับ แคปปิตอล กรุ๊ป โฮลดิ้งส์ จำกัด (Bitkub Capital Group Holdings Co., Ltd.)

2525 อาคารเอฟวายไอ เซ็นเตอร์ ตึก 2 ชั้นที่11 ยูนิท 2/1101-2/1107 ถนนพระรามที่4 แขวงคลองเตย เขตคลองเตย กรุงเทพมหานคร 10110
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Tel +66 2 032 9533



3. Personal data which the Company collects, uses, and discloses

For participating in the Events, it is necessary for the Bitkub Group Company to collect, use, and disclose your personal data 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, and legitimate interest pursued by the Company or by third party or other stakeholders and for public interest.

In this regard, the Bitkub Group Company may disclose or publish your personal data for the Events promotion purpose as well as disclose your personal data to organization or third party who relevant to the Events. The Bitkub Group Company will take steps to ensure that the disclosure is processed under legal bases and having the appropriate personal data protection measures.

Therefore, the Bitkub Group Company collects, uses, and discloses your personal data which including but not limited to these types of data as follows:

- (a) **Identity data** such as name, surname, age, job, identification number or passport number or any other documents issued by government offices, and the copy of identification card
- (b) **Contact data** such as phone number, email, address, and social media account
- (c) **Photo and video data** such as your photo and video recording which your voice included
- (d) **Events relevant data** such as your Event participation history, your registration history, and your satisfaction questionnaire
- (e) **Transaction and finance data** such as payment slip and Bitkub NEXT Wallet Address

4. Source of personal data

The Bitkub Group Company collect your personal data from various sources for the performance of the contract, for compliance with the legal obligation, and for the purpose of legitimate interest pursued by the Bitkub Group Company or by any relevant third party. In this regard, the Bitkub Group Company may collect your personal data as follows:

1. The Bitkub Group Company collects your personal data directly from you when you input your personal data to the document provided by the Bitkub Group Company both online and offline;
2. The Bitkub Group Company collects your personal data from affiliated company and/or business partner company in case where the Events in jointly organized by the Bitkub Group Company and those affiliated companies and/or the business partner companies or in case where the Bitkub Group Company is a sponsorship to them. In this regard, the collection of your personal data will be only for the purpose of contacting, registration to the Events, rewards receiving, and for the purpose of compliance with the legal

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obligation, performance of contract, and for legitimate interest pursued by the Bitkub Group Company or any third party relevant.

3. The Bitkub Group Company collects your personal data from your relatives in the event where you are their follower or where you are their point of contact.

5. Collection, use, and disclosure of your personal data

The Bitkub Group Company collects, uses, and discloses your personal data under the legal bases or exception according to Personal Data Protection Act B.E. 2562 for the purpose of the performance of the contract in participating in the Events with the Bitkub Group Company, for compliance with legal obligation, and legitimate interest pursued by the Bitkub Group Company or third party relevant.

In this regard, the Bitkub Group Company may disclose or publish some of your personal data for the purpose of the Events management. The Bitkub Group Company will take steps to ensure that your personal data is disclosed or published only for the necessary purpose and under the laws.

The table of the purpose of collection, use, and disclosure or transfer personal data to third party

Purpose of processing	Type of data	Legal bases and exception	Disclosure or transfer to third party
For the Events registration and coordination	(a) Identity data (b) Contact data (d) Events relevant data (e) Transaction and finance data	For the performance of the contract	None
In collection of photo and/or video within the Events	(a) Identity data (c) Photo and video data	Legitimate interest	- Social media platform such as Facebook, X, Instagram, TikTok, and YouTube as well as television and printing media and billboard. - Media business operator who is a business partner with the Bitkub Group Company for the public relations. - Business partner company and/or Bitkub Group Company (only in case where the Events organized by the Bitkub Group)

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Purpose of processing	Type of data	Legal bases and exception	Disclosure or transfer to third party
			Company and such affiliates or business partner) - The Bitkub Group Company may disclose and share your photo and/or video in shared drive such as Google Shared Drive which will be shared with Events participants.
In collection of individual photo and/or video as well as individual interviewing	(a) Identity data (c) Photo and video data	- Legitimate interest - Your consent	- Social media platform such as Facebook, X, Instagram, TikTok, and YouTube as well as television and printing media and billboard. - Media business operator who is a business partner with the Bitkub Group Company for the public relations. - Business partner company and/or Bitkub Group Company (only in case where the Events organized by the Bitkub Group Company and such affiliates or business partner) - The Bitkub Group Company may disclose and share your photo and/or video in shared drive such as Google Shared Drive which will be shared with Events participants.
Presenting the rewards within the Events and/or delivering the rewards to you	(a) Identity data (b) Contact data (e) Transaction and finance data	- For the performance of the contract - For compliance with the legal obligation	- The Bitkub Group Company will disclose your identification number to the Thai Revenue Department only in case when you get the reward costs over 1,000 Thai Baht. - The company in Bitkub Group Company for Airdrop the coin and/or token for you (only in case when you receive the digital currency as a reward) - Business partner who jointly organize the Events with the

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Purpose of processing	Type of data	Legal bases and exception	Disclosure or transfer to third party
			Bitkub Group Company or third party who is a service provider to deliver the rewards to you
To survey feedback from participating in the Events	(a) Identity data (b) Contact data	Legitimate interest	None

Remarks: In case that you do not agree the Bitkub Group Company to collect, use, and disclose your personal data for the purpose of the performance of the contract, the Bitkub Group Company may not provide a service to you.

6. Sending or transferring your personal data to overseas

1. The Bitkub Group Company may transmit or transfer your personal data 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 data (the data subject).
2. The Bitkub Group Company stores your personal data on servers or cloud computing provided by third party located abroad. In this regard, the Bitkub Group Company undertakes to ensure that the service provider has adequate personal data security safeguards available.
3. The Bitkub Group Company will comply with the personal data protection laws and take the necessary actions to ensure that your personal data which is sent or transferred to overseas will be adequately protected.

7. Personal data retention period

The Bitkub Group Company will store your personal data only for the period necessary to achieve 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 personal data retention policy of the Company and its affiliates. The Bitkub Group Company will delete or destroy the personal data or make it anonymous when the personal data 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.

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8. Personal data security measures

The Bitkub Group Company values the security of your personal data and therefore 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.

9. 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:

- 9.1. 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 us unless there is a legal limitation or there is a contract between you and the Company and/or its affiliates that benefit you.
- 9.2. 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 the Company collected, used, and disclosed and have the right to request us to disclose the source of your information.
- 9.3. Right to ratification:** You have the right to request us to rectify your personal data if it is inaccurate or incomplete.
- 9.4. Right to erasure your personal data or anonymize information:** You have the right to request us to erase, destruct or anonymize your personal data if your personal data is no longer necessary in relation to the purposes in which they were collected.
- 9.5. Right to restriction of processing your personal data:** You have the right to request us to restrict the processing of your personal data temporarily when the Company is in the process of investigating your request to information 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.
- 9.6. The right to information 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 rights.
- 9.7. The right to object the processing:** You have the right to object the data processing in some event.

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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 rights by download the data subject right request via this link:

<https://www.bitkubcapital.com/data-subject-right.html> and send the email to pr@bitkub.com

Please note that the exercise of right mentioned above may lose you some benefit or privilege from the Bitkub Group Company's products and services.

10. Notification of changes

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

11. Right to investigate and file a claim

In the event that you finds that the Bitkub Group Company has incorrectly processed your personal information or that the personal data 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 data according to the rights that you have according to the law.

12. Contact details

- **Bitkub Capital Group Holdings 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: pr@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_bcgh@bitkub.com

This Privacy Notice is updated on 14 June 2024

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