

Privacy Policy

Bitkub Chain Developer (“Developer”) is a registry platform provided by Bitkub Blockchain Technology Co., Ltd. (“Bitkub” or “Company” or “us” or “we” or “our”). The purpose of the Developer is to provide project information on Bitkub Chain such as APIs Document Developer community. You (hereinafter referred to as “you” or “your” or “user”) may use the Developer in order to register your project for verification. This Privacy Policy (“Privacy Policy”) informs you of how we collect, use or disclose your personal data, what and why we collect, use or disclose your personal data, how long we hold it, who we disclose it to, your rights, what steps we will take to make sure your personal data stays private and secure, and how you can contact us. This Privacy Policy is in accordance with the Personal Data Protection Act B.E. 2562 (“PDPA”) and relevant laws and regulations.

This Privacy Policy applies to:

(1) Our users

- Individual users: our past and present users who are individual
- Corporate users: directors, shareholders, ultimate beneficial owners, employees, guarantors, security providers, and legal representatives of our past and present corporate users and other individuals authorised persons and any of relevant individuals have acknowledged our privacy notice.

(2) Non-users

These include individuals who have no product or service holding with us, but we may need to collect, use or disclose your personal data, e.g. anyone that visits our website or our applications, branches or office; guarantors or security providers; ultimate beneficial owner; directors or legal representatives of a company that uses our services; debtors or tenants of our users; professional advisors, including our directors, investors, shareholders and their legal representatives, and anyone involved in other transactions with us or our users.

Please note that some of the links on our platform may lead to third party’s platforms, and if you access these platforms, your personal data will then be processed under the third party’s policies. Make sure that you have read those privacy notices when accessing such platforms.

1. How we collect, use or disclose your personal data

We only collect, use or disclose your personal data you give us where it is necessary or there is a lawful basis for collecting, disclosing and using it. This includes where we collect, use or disclose your personal data based on the legitimate grounds of legal obligation, performance of contract made by you with us, our legitimate interests, performance under your consent and other lawful basis. Reasons for collecting, using, or disclosing are provided below:

1.1. To comply with law

We are regulated by many laws, rules, regulations, and orders of any governmental, supervisory or regulatory authorities, and to fulfill our legal and regulatory requirements, it is necessary to collect, use or disclose your personal data for the following purposes, which included but are not limited to:

- a) Compliance with the PDPA and any amendments thereof;
- b) Compliance with laws (e.g. Digital Asset Laws, Securities and Exchange Laws, Anti-Money Laundering Laws, Prevention and Suppression of Financial Support to Terrorism and the Proliferation of Weapons of Mass Destruction Laws, and other laws to which we are subject in Thailand and in other countries), including conducting identify verification, background checks and credit checks, Know Your Client/Customer Due Diligence (KYC/CDD) processes, other checks and screening procedures (including screening against publicly available database of regulatory authorities and/or official sanction lists), and ongoing monitoring that may be required under applicable law; and/or
- c) Compliance with regulatory obligations and/or orders of authorized persons (e.g. orders by any court of competent jurisdiction or of governmental, supervisory or regulatory authorities or authorized officers).

1.2. To provide our service

We will collect, use, or disclose your personal information in accordance with the request and/or agreement made by you with us, for the following purposes, which include but are not limited to:

- a) Process you request prior to entering into an agreement, consider for approval in relation to the provision of products and/or services, and delivery our products and/or services to you including any activities that if we do not proceed, then our operations or our services may be affected or may be affected or may not be able to provide to you with fair and ongoing services;
- b) Verify your account;
- c) Authenticate when entering into, doing or executing any modifications;
- d) Carry out your instructions;
- e) Provide online product platforms;
- f) Track or record your transactions;
- g) Produce reports.

1.3. To optimise our platform

We rely on the basis of legitimate interests by considering our benefits or third party's benefits with your fundamental rights in personal data which we will collect, use or disclose for the following purposes, which includes but not limited to:

- a) Conduct our business operations and our financial business group companies' business operations (e.g. to audit, to conduct risk managements, to monitor, prevent, and investigate fraud, money laundering, terrorism, misconduct, or

other crimes, including but not limited to carrying out the creditworthiness checks of any persons related to our corporate user);

- b) Conduct our relationship management (e.g. to serve users, to conduct user survey, to handle complaints);
- c) Ensure security (e.g. to maintain CCTV records, to register, exchange identification card and/or take photo of visitors before entering into our building);
- d) Develop and improve our products, services and system to enhance our services standard and/or for the greatest benefits in fulfilling your needs, including to conduct research, analyse data and offer products, services and benefits suitable to you by considering the fundamental rights in your personal data. If you do not wish to receive the offering of products, services and benefits from us, you can contact us through our Call Center Tel +66-2-032-9555;
- e) Record images and/or voice recordings relating to the meetings, trainings, seminars, recreations or marketing activities; and/or
- f) In the case of our corporate user, we will collect, use and disclose personal data of directors, authorized representatives or attorneys.

1.4. With your consent

In certain circumstances, we may ask for your consent to collect, use or disclose your personal data to maximise your benefits and/or to enable us to provide services to fulfil your needs for the following purposes, which include but not limited to:

- a) To collect and use your sensitive personal data as necessary (e.g. to use face recognition or your identification card photo, which contains your sensitive personal data, namely religion and/or blood type) for verification of your identity before continuing the transaction);
- b) Collect and use your personal data and any other data to conduct research and analyse for the greatest benefits in developing products and services to truly fulfill your needs and/or to contact you for offering products, services and benefits exclusively suitable to you;
- c) Send or transfer your personal data overseas, which may have inadequate personal data protection standards (unless the PDPA specified that we may proceed without obtaining consent); and/or
- d) When you are classified as a minor, incompetent or quasi-incompetent whose consent must be given by their parent, guardian or curator (as the case may be) (unless the PDPA specifies that we may proceed without obtaining consent); and/or
- e) Disclose your personal data and any other data to our business group companies as shown on and our trusted business partners for the following purposes: (1) conducting research and analyzing your personal data and any

other data for the greatest benefits in developing products and services to truly fulfill your needs; and (2) contacting you for offering products, services and benefits exclusively suitable to you.

1.5. Other lawful basis

Apart from the lawful basis which we mentioned above, we may collect, use or disclose your personal data based on the following lawful basis:

- a) Prepare historical data for the public interest, or for purposes related to research or statistics;
- b) Prevent or suppress a danger to a person’s life, body or health; and/or necessary to carry out a public task, or for exercising official authority.

If the personal data we collect from you is required to meet our legal obligations or to enter into an agreement with you, we may not be able to provide (or continue to provide) some or all of the products or services to you if you do not provide such personal information when requested.

2. What personal data do we collect, use or disclose

The type of personal information, namely personal data and sensitive personal data, which we collect, use or disclose, varies on the scope of products and/or services that you may have used or had an interest in. The type of personal data shall include but not limited to:

Category	Examples of Personal Data
Personal Details	<ul style="list-style-type: none"> • Given name, middle name, surname, hidden name (if any) • Gender • Date of birth • Age • Marital status • Nationality
Contact details	<ul style="list-style-type: none"> • Mailing address • E-mail address • Phone number • Facsimile number • Name of representatives or authorised persons/directors acting on behalf of our users
Identification and authentication details	<ul style="list-style-type: none"> • ID card photo • Identification number • Passport information • Driving license • Signatures

Market research, marketing and sales information	<ul style="list-style-type: none"> • User survey • Information and opinion expressed when participating in market research • Details of services you receive and your preferences
Geographic information and information about your device and your software	<ul style="list-style-type: none"> • Your GPS location • IP address • Technical specifications and uniquely identifying data
Investigation data	<ul style="list-style-type: none"> • Data for due diligence checks (e.g. information related to Know Your Client (KYC) or Customer Due Diligence (CDD)) • Data for risk management or Anti-Money Laundering and Combating the Financing Terrorism (AML/CFT) checks
User login and subscription data	<ul style="list-style-type: none"> • Login information for using our system, online internet transaction, and applications
Information concerning security	<ul style="list-style-type: none"> • Visual images • Personal appearance • Detection of any suspicious and unusual activity • CCT images or recordings • Video recordings
Sensitive personal data	<ul style="list-style-type: none"> • Biometric information (e.g. face recognition, fingerprint, voice recognition and retina recognition)
Other information	<ul style="list-style-type: none"> • Records of correspondence and other communications between you and us, in whatever manner and form, including but not limited to phone, e-mail, live chat, instant messages and social media communications • Information about insurance policy and claim for compensation (e.g. policy coverage, media records, insurance claims history)

	<ul style="list-style-type: none">• Information that you provide to us through any channels
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3. Sources of your personal information

Normally, we will collect your personal data directly from you, but sometimes we may get it from other sources, in such cases we will ensure compliance with the PDPA.

- a) Information obtained by us from financial business group companies, business partners, and/or other persons who we have relationships with;
- b) Information obtained by us from persons related to you (e.g. your family, friends, referees);
- c) Information obtained by us from corporate customers as you are directors, authorised person, attorney, representative or contact person;
- d) Information obtained by us from governmental authorities, regulatory authorities, financial institutions, credit bureau and/or third-party service providers (e.g. information that is publicly available, or that relates to transactions, credit information); and/or
- e) Information obtained by us from insurance companies and/or other persons in relation to insurance policy or claim for compensation.

4. Your rights

The PDPA aims to give you more control of your personal information. You can exercise your rights under the PDPA upon the effectiveness of the provisions in relation to rights of data subjects, details are as follows:

4.1. Right to access and obtain copy

You have the right to access and obtain copies of your personal data held by us, unless we are entitled to reject your request under the laws or court orders, or if such request will adversely affect the rights and freedoms of other individuals.

4.2. Right to rectification

You have the right to rectify your inaccurate personal data and to update your incomplete personal data.

4.3. Right to erasure

You have the right to request us to delete, destroy or anonymise your personal data, unless there are certain circumstances where we have the legal grounds to reject your request.

4.4. Right to restrict

You have the right to request us to restrict the use of your personal data under certain circumstances (e.g. when we are pending examination process in accordance with

your request to rectify your personal data or to object the collection, use or disclosure of your personal data, or your request to restrict the use of your personal data instead of the deletion or destruction of your personal data which is no longer necessary as you have necessity to retain it for the purposes of establishment, compliance, exercise or defense of legal claims).

4.5. Right to object

You have the right to object the collection, use or disclosure of your personal data in case we proceed with legitimate interests basis or for the purpose of direct marketing, or for the purpose of scientific, historical or statistic research unless we have legitimate grounds to collect, use or disclose your personal data, or the collection, use or disclose your personal data is carried out for the establishment, compliance, or exercise legal claims, or for the reason of our public interests.

4.6. Right to data portability

You have the right to receive your personal data in case we can arrange such personal data to be in the format which is readable or commonly used by ways of automatic tools or equipment, and can be used or disclosed by automated means. Also, you have the right to request us to send or transfer your personal data to third parties, or to receive your personal data which we sent or transferred to third parties, unless it is impossible to do so because of the technical circumstances, or we are entitled to legally reject your request.

4.7. Right to withdraw consent

You have the right to withdraw your consent that has been given to us at any time pursuant to the methods and means prescribed by us, unless the nature of consent does not allow such withdrawal. The withdrawal of consent will not affect the lawfulness of the collection, use or disclosure of your personal data based on your consent before it was withdrawn.

4.8. Right to lodge a complaint

You have the right to make a complaint with the Personal Data Protection Committee or their office in the event that we do not comply with the PDPA.

5. How we share your personal data

We may disclose your personal data to the following parties under the provisions of the PDPA:

- a) Our financial business group companies, business partners and/or other persons that we have the legal relationship with, including our directors, executives, employees, staffs, contractors, representatives, advisors and/or such persons' directors, executive officers, employees, staffs, contractors, representatives, and advisors;

- b) Governmental authorities and/or supervisory or regulatory authorities (e.g. Bank of Thailand, the Securities and Exchange Commission, Office of Insurance Commission, Ministry of Digital Economy and Society);
- c) Suppliers, agents and other entities (e.g. professional associations to which we are member, external auditors, depository institutions, document warehouses, overseas financial institutions, clearing houses) where the disclosure of your personal data has a specific purpose and under lawful basis, as well as appropriate security measures;
- d) Any relevant persons as a result of activities relating to selling rights of claims and/or assets, restructuring or acquisition of any of our entities, where we may transfer their rights to; any persons with whom we are required to share data for proposed sale, reorganization, transfer, financial arrangement, asset disposal or other transaction relating to our business and/or assets held by our business;
- e) Other banks, financial institutions and third parties where required by law to help recover funds that have entered into your account due to misdirected payment(s) by such third parties or trace funds where you are a victim of suspected financial crime, or where suspect funds have entered your account as a result of financial crime;
- f) Debt collection agencies, lawyers, credit bureau, fraud prevention agencies, courts, authorities or any persons whom we required or permitted by laws, regulations, or orders to share personal information;
- g) Third parties providing services to us (e.g. market analysis and benchmarking, including but not limited to correspondent, agents and subcontractors acting on our behalf, the companies which print and deliver credit card statements);
- h) Social media service providers (in a secure format) or other third-party advertisers so they can display relevant messages to you and others on our behalf about our products and/or services. Third-party advertisers may also use information about your previous online activities to tailor adverts to you;
- i) Third-party security providers;
- j) Other persons that provide you with benefits or services associated with our products or services (e.g. insurance company); and/or
- k) Your attorney, sub-attorney, authorized persons or legal representatives who have lawfully authorised power.

6. International transfer of personal data

The nature of the modern cryptocurrency business is global and under certain circumstances it is necessary for us to send or transfer your personal data internationally. When sending or

transferring your personal data, we will always exercise our best efforts to have your personal data transferred to our reliable business partners, service providers or other recipients by the safest method in order to maintain and protect the security of your personal data, which includes the following circumstances:

- a) Comply with legal obligations;
- b) Inform you the inadequate personal data protection standards of the destination country and obtain your consent;
- c) Perform the agreement made by you with us or your request before entering into an agreement;
- d) comply with an agreement between us and other parties for your own interest;
- e) Prevent or suppress a danger to your or other persons' life, body or health and you are incapable of giving consent at such time; or
- f) Carry out activities relating to the substantial public interest.

7. Retention period of personal data

We will maintain and keep your personal data which you are our users and once you has ended the relationship with us (e.g. after you closed your account with us, or following a transaction with us, or in case of your application to use our services is disapproved, or you terminate the services provided by us), we will only keep your personal data for a period of time that is appropriate and necessary for each type of personal data and for the purposes as specified in the PDPA.

The period we keep your personal data will be linked to the prescription period or the period under the relevant laws and regulations (e.g. Financial Institutions Businesses Laws, Securities and Exchange Commission Laws, Anti-Money Laundering Laws, Counter-Terrorism and Proliferation of Weapon and Mass Destruction Financing Laws, Accounting Laws, Tax Laws, Labour Laws and other laws to which we are subject both in Thailand and other countries). In addition, we may need to retain records of CCTV surveillance in our head office, our branches or at ATM machines and/or voice records of Call Center to prevent fraud and to ensure security, including investigating suspicious transactions which you or related persons may inform us of.

8. Use of cookies

We may collect and use cookies and similar technologies when you use our products and/or services. This includes when you use our websites and applications.

The collection of such cookies and similar technologies helps us recognise you, remember your preferences and customise how we provide our products and/or services to you. We may

use cookies for a number of purposes (e.g. enabling and operating basic functions, helping us understand how you interact with our websites or emails, or enabling us to improve your online experiences or our communications with you, particularly, to ensure that online adverts display to you will be more relevant to you and of your interests.)

8.1. Cookies we use

- 8.1.1. **Strictly Necessary Cookies:** These Cookies are essential to our service in order to facilitate our authentication, registration, log-in or navigate the features of our services and cannot be switched off in our system. Without these cookies, you may not be able to take full advantage of our services or features, and our service will not perform as smoothly for you as we would like.
- 8.1.2. **Analytical/ Performance Cookies:** These cookies allow us to measure and improve the performance of our sites. The information will help us create reports and statistics on visits and traffic sources. Performance cookies collect information such as your IP address, type of device, operating system, date and time of page visits, and pages visited. If you do not allow these cookies we will not know when you have visited our site, and will not be able to monitor its performance. The information allows us to record any difficulties encountered with our services and show us whether our advertising is effective or not.
- 8.1.3. **Functional Cookies:** Functional cookies collect information on the usage of our website, including for instance users language preferences, theme preferences or login sessions. Functional cookies serve the purpose of improving the user friendliness of a website and therefore ensuring the user's best experience.
- 8.1.4. **Cookies for marketing purposes:** Cookies for marketing purposes are used to offer more relevant content to users, based on their specific interests. They are also used to limit the display frequency of an ad and to measure and control the effectiveness of advertising campaigns. They register whether users have visited a website or not, and which contents were used.

9. **Use of personal data for original purposes**

We are entitled to continue collecting and using your personal data, which has previously been collected by us before the effectiveness of the PDPA in relation to the collection, use and disclosure of personal data, in accordance with the original purposes. If you do not wish us to continue collecting and using your personal data, you may notify us to withdraw your consent at any time.

10. **How your information is secured**

We endeavour to ensure the security of your personal data through our internal security measures and strict policy enforcement. The measures extend from data encryption to firewalls. We also require our staff and third-party contractors to follow our applicable privacy standards and policies and to exercise due care and measures when using, sending or transferring your personal data. Users of the services are responsible for maintaining the security of any password, biometrics, user ID or other form of authentication involved in obtaining access to the password protected or secure areas of any of our digital services. In order to protect you and your data, we may suspend your use of any of the services, without notice, pending on investigation, if any breach of security is suspected.

11. How to contact us

If you have any questions or would like more information about our Privacy Policy or would like to exercise your rights, please contact us through bitkubchain@bitkub.com

Alternatively, you can contact our Data Protection Officer by writing to email: dpo@bitkub.com or contact our office located at 2525, FYI Center, Tower 2, 11th floor, Unit 2/1101-2/1107, Rama 4 Road, Klongtoei Sub-district, Klongtoei District, Bangkok, Thailand 10110.

12. Changes to this Privacy Policy

We may change or update this privacy notice from time to time and we will inform the updated Privacy Policy notice via the application.