

## **Privacy Notice for Bitkub NFT Marketplace and Social DAO 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 NFT Marketplace and Social DAO (“**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, and surname
- (b) **Photo and video data** such as personal photo in NFT, photo, and video
- (c) **Job and responsibility data** such as NFT on NFT store
- (d) **Contact data** such as email, phone number, address, and social media account
- (e) **Technical data** such as Wallet address, NFT data
- (f) **Transaction and finance data** such as bank account name, bank account number, blockchain transaction, NFT transaction history, and BCS transaction history
- (g) **Service relevant data** such as NFT holding data, reward redemption data, gashapon data, whitelist data, token deposit history, token withdraw history, swapping KKUB coin to BCS coin history, and NFT details for opening NFT store

### 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 website
- 2) The Company collects your personal data from Creative Studio store or business partner
- 3) The Company collects your personal data when you connect Bitkub NEXT account

### 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>			
Logging in to use the Product via Bitkub NEXT account verification	(d) Contact data (e) Technical data	For the performance of the contract	None
Displaying profile	(d) Contact data (e) Technical data (g) Service relevant data	For the performance of the contract	None
Purchasing NFT on website via gashapon by token or Thai Baht	(e) Technical data (f) Transaction and finance data (g) Service relevant data	For the performance of the contract	- The Company discloses your personal data to NFT store to manage gashapon whitelist right - The Company discloses your personal data to online payment gateway in case that you purchase NFT with Thai Baht

Purpose of Processing	Type of personal data	Legal basis and exception	Disclosure or transfer to third party
Purchasing NFT which listed fixed price by token or Thai Baht	(e) Technical data (f) Transaction and finance data (g) Service relevant data	For the performance of the contract	The Company discloses your personal data to online payment gateway in case that you purchase NFT with Thai Baht
Reward redemption via Bitkub NFT and receive the reward	(a) Identity data (d) Contact data (e) Technical data (f) Transaction and finance data (g) Service relevant data	For the performance of the contract	The Company discloses your personal data to business partner or creator who is the activity owner for delivering reward for you in case that you receive reward
Participating in Voting and Poll activity in Bitkub NFT Social DAO	(a) Identity data (d) Contact data (e) Technical data (f) Transaction and finance data (g) Service relevant data	For the performance of the contract	The Company discloses your personal data to business partner or creator who is the activity owner for delivering reward for you in case that you receive reward
Participating in Lucky pool activity in Bitkub NFT Social DAO	(a) Identity data (d) Contact data (e) Technical data (f) Transaction and finance data (g) Service relevant data	For the performance of the contract	The Company discloses your personal data to business partner or creator who is the activity owner for delivering reward for you in case that you receive reward
Displaying blockchain data on website	(e) Technical data (f) Transaction and finance data	For the performance of the contract	None
Airdrop NFT for User who participating in the Company's activity via Bitkub NFT- Back Office Admin tools	(d) Contact data (e) Technical data (g) Service relevant data	For the performance of the contract	None
<b>Complaints management</b>			
Receiving Product's issue via live chat	(a) Identity 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		

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)

This privacy notice was updated on 16 October 2024