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## **Privacy Notice for CCTV use Bitkub Capital Group Holdings Co., Ltd.**

Bitkub Capital Group Holdings Co., Ltd. (the “**Company**”, “**We**” or “**Our**”) and its affiliates (collectively called “**Bitkub Group Company**”) installed CCTV cameras in our premises to monitor specific spaces for safety and security of our buildings, assets, employees, customers, and visitors (“**you**” or “**your**”). This privacy notice provides information on collection, use, and disclosure of your personal data (collectively called “**Personal Data Processing**” or “**Processing**”) collected by our CCTV system and your rights as a data subject.

### **1. Personal data that the Company collects, uses, and discloses**

The Company collects, uses, and discloses images and videos containing you when you are inside the premises, recorded by CCTV cameras which are installed at specific spaces inside and around the premises and facilities, with the exception of certain areas, such as the lavatories. The CCTV system is operated 24 hours, except in the case of malfunction or system maintenance. In this regard, The Company will place signage at the entrance and exit points, and the monitored areas to alert you that a CCTV installation is in use.

### **2. Enforcement scope of this privacy notice**

This privacy notice applies to the Bitkub Group Company’s employees, customers, business partners, vendors, and visitors.

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

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

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

2525 อาคารเอฟวายไอ เซ็นเตอร์ ตึก 2 ชั้นที่11 ยูนิต 2/1101-2/1107 ถนนพระรามที่4 แขวงคลองเตย เขตคลองเตย กรุงเทพมหานคร 10110  
(2525, FYI Center, Tower 2, 11th floor, Unit 2/1101-2/1107, Rama 4 Road, Klongtoei Sub-district, Klongtoei District, Bangkok 10110)  
Tel +66 2 032 9533



### **3. Purposes for Processing personal data**

The Company collects your personal data for the following purposes:

- 1) To monitor and maintain the security of the Company's premises;
- 2) To assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings;
- 3) To assist in the investigation or proceedings concerning a whistleblowing complaint and loment proceedings.

### **4. Legal Bases**

The Processing of your personal data above is necessary for the Company's legitimate interest for guaranteeing the security of the Company's premises as mentioned in article 3.

### **5. Disclosure of personal data to third parties**

We may disclose your personal data to third parties if we consider that the disclosure is necessary for the purposes described above. In this regard, the Company may disclose your personal data in these cases as follows:

- 1) We may share information from CCTV footage to our affiliates and/or service providers to implement necessary actions for prevention of danger to a person's life, body or health including protection of belongings.
- 2) We may share information from CCTV footage with competent government authorities, such as police officers and courts, upon written request from government authorities or such request is for the investigative process of government authorities or for litigation in court proceedings.

### **6. Personal data retention period**

The Company may retain your personal data no longer than 90 days or as is necessary to achieve the purposes described in this notice or as is required by applicable laws. We may need to retain your personal data as long as it is necessary for any disputes or legal proceedings that may arise. If we are no longer needed to retain your personal data regarding to the necessary in relation to the purpose for which it was collected or processed or when the period specified in the retention policy of the Company and its affiliates ends, we will destroy, delete, remove, or anonymize your personal data.

### **7. Personal data security measures**

The Company values the security of your personal data. Therefore, the Company puts in place appropriate technical and administrative security measures to ensure that your personal data will

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not be accessed, modified, altered, deleted, or destroyed by unauthorized persons. The Company also arranges to review such measures when necessary or when the technology changes to ensure that data security is always effective.

## 8. Exercising your rights as a data subject

As the data subject, you have the rights to your personal data as set forth in the Personal Data Protection Act B.E. 2562, any relevant laws, notifications, and regulations, including:

### 1. Right of access

You have the right to request access to your personal data that the Company collects, uses, and discloses, and you have the right to request the Company to inform the source of the personal data, except in the case where the Company has the right to deny your request according to the law or court order, or in the case where your request will have an impact that may cause damage to the rights and freedoms of other people.

### 2. Right to withdraw consent

You have the right to withdraw the consent for data processing that you have given us at any time unless there is a legal limitation or there is a contract between you and the Company and/or its affiliates that benefit you.

### 3. Right to data portability

You have the right to request automatic transfer of personal data to another data controller unless it is unfeasible to do so due to a technical condition. The Company currently does not have a system to support the exercise of right under this clause.

### 4. Right to object

You have the right to object to the Processing of your personal data in the event that the Company processes your personal data under the legitimate interest of the Company and/or its affiliates or other stakeholders. However, the Company may deny your exercising this right in the event when the Company can indicate the lawful basis in Processing that may be important than your right or the Processing is necessary to exercise legal claims.

### 5. Right to erasure / Right to be forgotten

You have the right to request the Company to erase, delete, destruct, or anonymize of your personal data when the Company is no longer necessary for the purposes set out by the Company.

### 6. Right to restriction of processing

You have the right to request that the Company restrict the processing of your personal data in certain circumstances.

### 7. Right to rectification

You have the right to have the Company rectify inaccurate or incomplete your personal data.



## 8. Right to lodge a complaint

You have the right to lodge a complaint to the Personal Data Protection Commission or the Office of the Personal Data Protection Commission if you believe that the collection, use, and/or disclosure of Personal Data is proceeded in a manner that violates or fails to comply with relevant laws.

However, you may not be able to exercise your right under the laws or the exercise of right may in certain cases incur costs if it appears that your request has the following characteristics:

1. It is contrary to or is not in line with the rights prescribed in the Personal Data Protection Act B.E. 2562 (2019), relevant laws or notifications.
2. It is contrary to or is not in line with a provision of law or court order.
3. It affects the rights and freedoms of other person(s).
4. It is bad-faith, unnecessary, or unreasonable exercise of right.
5. It affects the investigation, the exercise of rights in the judicial process, or the court proceedings or decisions, 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](mailto:pr@bitkub.com)

## 9. Contact details

If you have any question, suggestion or need more information regarding our activities or this notice, please contact:

- **Bitkub Capital Group Holdings Co., Ltd.** 2525 FYI Center, 11th Floor, Unit 2/1101-2/1107, Rama 4 Road, Khlong Toei Sub-district, Khlong Toei District, Bangkok 10110, Tel. 02-032-9533
- **Data Protection Officer:** 2525 FYI Center, 11th Floor, Unit 2/1101-2/1107, Rama 4 Road, Khlong Toei Sub-district, Khlong Toei District, Bangkok 10110. Email [dpo\\_bcg@bitkub.com](mailto:dpo_bcg@bitkub.com)

This privacy notice is updated on 14 June 2024