

## Privacy Notice for Vendor and Business Partner Bitkub Capital group Holdings Co. LTD.,

Bitkub Capital Group Holdings Co., Ltd (“**Company**”) respects and recognizes 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 personal data (collectively called “**Processing**”).

### 1. **Person whom the Company collect personal data**

1. **Vendor** means neutral person who sell, will sell and/or provide or will provide service to the Company also including neutral person relevant to or representative of juristic person which is the Company’s vendor and its employee, representative, or authorized person who collect personal data for contact or enter into transaction with the Company.
2. **Business partner** means neutral person who is not the Company’s customer or vendor but relevant to the Company’s business such as business partner, regulator of the government office also including the representative or authorized person of juristic person which is the Company’s business partner.

### 2. **Personal data which the Company collect, use, and disclose**

Company collects, uses and discloses various types of personal data which can be divided as follow:

- a. **Identity data** such as name, surname, identification number, copy of identification number, passport number, and taxpayer identification number  
Remark: In general, the Company unintentionally collects and uses sensitive data which appear on your identification card such as religious and blood type. In the event where you must send the copy of your identification card to us, please cover such data, if not, the Company may cover your sensitive data for your privacy and the security reasons.
- b. **Contact data** such as address, office address, phone number, and email
- c. **Transaction and finance data** such as transaction history and bank account number.
- d. **Job position and responsibility** such job position, responsibility, and your company’s name
- e. **Capability and appropriation of service assessment**

The Company collects, uses, and discloses 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, legitimate interest pursued by the Company or by third party or other stakeholders, and for public interest and vital interest.

In this regard, the Company may disclose or transfer your personal data to third party and the Company will take steps to ensure that such disclosure is processed under legal bases and having the appropriate personal data protection measures.

**The table of purpose of use and disclose or transfer personal data to third party**

The purpose of processing	Type of data	Legal bases and exception	Disclosure or transfer to third party
For contacting	(a) Identity data (b) Contact data (d) Job position and responsibility	- For the performance of the contract  - Legitimate interest	None
For any processing necessary for or prior to entering into a contract or a transaction	(a) Identity data (b) Contact data (d) Job position and responsibility	- For the performance of the contract  - Legitimate interest	- The Company's legal consultant
For products and services payment and for the Company's imbursement	(a) Identity data (b) Contact data (d) Job position and responsibility	- For the performance of the contract  - For compliance with a legal obligation	- The Company's accounting service provider  - Relevant government office such as auditor and the Revenue Department

The purpose of processing	Type of data	Legal bases and exception	Disclosure or transfer to third party
Conducting the processes of service provider selection	(a) Identity data (b) Contact data (c) Transaction and finance data (d) Job position and responsibility (e) Capability and appropriation of service assessment	- For the performance of the contract  - Legitimate interest	None
For internal audit, control, and complaints investigation as well as the corruption prevention and for compliance with the legal obligation.	(a) Identity data (b) Contact data (c) Transaction and finance data (d) Job position and responsibility (e) Capability and appropriation of service assessment	- For the performance of the contract  - For compliance with a legal obligation	- Company's internal control and audit service provider
To store data on cloud storage platform for security reason and data backup	(a) Identity data (b) Contact data (c) Transaction and finance data (d) Job position and responsibility (e) Capability and appropriation	- For the performance of the contract  - Legitimate interest	Cloud computing service provider

The purpose of processing	Type of data	Legal bases and exception	Disclosure or transfer to third party
	of service assessment		

Remark: If you refuse the Company to collect, use, and disclose any personal data which is necessary for the performance of contract or for the compliance with a legal obligation, the Company may not be able to provide service to you.

### 3. Sending or transferring your personal data to overseas

1. The 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 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.
3. The 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 is adequately protected.

### 4. Source of personal data

Normally, the Company will collect your personal data directly from you. However, in some cases, the Company may need to collect your personal data from other sources if it is necessary for compliance with a legal obligation, performance of a contract and for the purpose of legitimate interest pursued by the Company or by a third party or other stakeholders.

### 5. Personal data storage time period

The Company will store 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 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.

## 6. Personal data security measures

The company values the security of your personal data. 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 data security is always effective.

## 7. Exercising your rights as an data owner

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:

- 7.1. **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.
- 7.2. **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 data.
- 7.3. **Right to ratification:** You have the right to request us to rectify your personal data if it is inaccurate or incomplete.
- 7.4. **Right to erasure your personal data or anonymize data:** 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.
- 7.5. **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 are in the process of investigating your request to data 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.
- 7.6. **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 do not yet have a system to support the exercise of such rights.
- 7.7. **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 right 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 has an effect on the investigation exercise of judicial rights or court proceedings, etc.

You can exercise your right by download the data subject right request via this link:

<https://www.bitkubcapital.com/data-subject-right.html> and send the email to [business@bitkub.com](mailto:business@bitkub.com)

Please note that the exercise of right mentioned above may lose you some benefit or privilege from our products and services

## 8. Notification of changes

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

## 9. Right to investigate and file a claim

In the event that you finds that the Bitkub Group Companies has incorrectly processed your personal data 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.

## 10. 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 [business@bitkub.com](mailto:business@bitkub.com)
- **Data Portection Officer:** 2525 FYI Center Building 2, 11th Floor, 2/1101-2/1107 Units, Rama IV Road, Klongtoey Sub-district, Klong Toei District, Bangkok 10110 email [dpo\\_bcg@bitkub.com](mailto:dpo_bcg@bitkub.com)

This Privacy Notice is updated on 14 June 2024

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