
Privacy Notice for Job Candidate and Internship Candidate

Bitkub Capital Group Holdings Co., Ltd. and Affiliates

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 ensure that your personal data is 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 (collectively called “**Processes**” “**Processed**” or “**Processing**”) of personal data of the job candidates and internship candidates (collectively referred to as “**Candidates**”) as follows:

1. Enforcement scope of this privacy notice

This privacy notice applies to the Candidates of the Company and/or the Bitkub Group Company. Therefore, the Bitkub Group Company means the company as follows:

- 1) Bitkub Capital Group Holdings Co., Ltd.
- 2) Bitkub Online Co., Ltd.
- 3) Bitkub Blockchain Technology Co., Ltd.
- 4) Bitkub Labs Co., Ltd.
- 5) Bitkub Ventures Co., Ltd.
- 6) Bitkub Longevity Co., Ltd.
- 7) Bitkub Moonshot Co., Ltd.
- 8) Bitkub Portal Co., Ltd.
- 9) Bitkub Advisory Co., Ltd.
- 10) Open Q Co., Ltd.

11) Any limited company or public limited company in which the Bitkub Capital Group Holdings Co., Ltd. holds shared amounting to 50 per cent or more of all issued shares, unless specified otherwise

2. **Personal data which the Company and/or the Bitkub Group Company Process**

The Company and/or the Bitkub Group Company Process various types of your personal data including but not limited to as follows:

- (a) **Identity data** such as name, surname, data on national identification card
- (b) **Contact data** such as mobile phone number and email address
- (c) **Job application data** such as resume, cover letter, work experience, employment certificate, a copy of pay slip and copy of academic transcript
- (d) **Employment data** such as salary, job title, and employment contract
- (e) **Financial data** such as a copy of bank book
- (f) **Criminal record data**
- (g) **Credit bureau data**
- (h) **List of designated persons**

3. **Source of personal data**

The Bitkub Group Company collect your personal data from various sources for compliance with the legal obligation and legitimate interest pursued by the Company and/or the Bitkub Group Company. In this regard, the Bitkub Group Company collect your personal data by these following sources.

1. Directly from you when you apply for a job or internship with the Bitkub Group Company

2. From the website or platform for job vacancy announcement
3. From your university
4. For credit bureau checks (only for Candidates for whom the Bitkub Group Company considers a credit bureau check necessary)), the Bitkub Group Company collects your personal data directly from you by disclosing the credit bureau report to the Company
5. For screening against the list of designated persons (only for Candidates for whom the Bitkub Group Company considers such screening necessary)), the Bitkub Group Company collects your personal data from the AMLO Person Screening system: APS system

4. Processing of your personal data

The Bitkub Group Company Processes your personal data under the legal bases or exemption provided to Personal Data Protection Act B.E. 2562, including where necessary for the performance of a contract, compliance with applicable laws, notifications, rules, regulations, and orders issued by relevant government authorities or regulatory authorities, and for the legitimate interests of the Bitkub Group Company or other third-party stakeholders.

In this regard, during the job application process or the employee onboarding process, the Bitkub Group Company may disclose certain personal data relating to you to other parties for the purposes of such processes. The Bitkub Group Company will take steps to ensure that your personal data is disclosed and transferred only to the extent necessary and in accordance with applicable legal requirements.

Table of Examples of Purposes for the Use, Disclosure, or Transfer of Personal Data to External Organizations

Purpose of Processing	Type of Personal Data	Legal basis for Processing	Disclosure or transfer to third party
Recruiting Candidates via the Bitkub Group Company's job application website and/or other job application websites or platforms	(a) Identity data (b) Contact data (c) Job application data	Legitimate interest	None
Contacting Candidates selected for employment or internship	(a) Identity data (b) Contact data	Legitimate interest	None
Interviewing Candidates	(a) Identity data (b) Contact data (c) Job application data	Legitimate interest	None
Sending job offer letter to Candidates selected for employment or internship	(a) Identity data (b) Contact data (d) Employment data	Legitimate interest	None
Verifying Candidates' suitability for employment through criminal record checks	(a) Identity data (f) Criminal record data	- Your consent - For compliance with the legal obligation - Legitimate interest	Relevant government authorities with duties under applicable laws (only upon official request for such information)

Purpose of Processing	Type of Personal Data	Legal basis for Processing	Disclosure or transfer to third party
		- Explicit Consent	
Verifying candidates' suitability for employment through credit bureau checks	(a) Identity data (g) Credit bureau data	Legitimate interest	None
Screening against the list of high-risk individuals for money laundering purposes and designated persons	(a) Identity data (h) List of designated persons	For compliance with the legal obligation	Relevant government authorities with duties under applicable laws (only upon official request for such information)
Reviewing the Candidates' documents selected for employment or internship	(a) Identity data (b) Contact data (c) Job application data (d) Employment data (e) Financial data	- For the performance of the contract - Legitimate interest	None
Entering into the employment contract	(a) Identity data (d) Employment data	For the performance of the contract	None

5. Sending or transferring your personal data to overseas

5.1. The Bitkub Group Company may disclose or transfer your personal data to a foreign country where your explicit consent has been obtained, or where such disclosure or

transfer is necessary for legal obligation, for the performance of a contract to which you are a party, or for taking steps under a contract between the Bitkub Group Company and another person or juristic person for the benefit of the data subject.

5.2. The Bitkub Group Company will comply with the personal data protection laws and take the necessary measures to ensure that your personal data transferred to a foreign country is protected by appropriate safeguards.

6. Retention period of Personal Data

The Bitkub Group Company will store your personal data only for the period necessary to achieve the purposes notified above, or for the duration required by applicable laws in cases where a specific legal retention period is prescribed, to comply with applicable laws, or to exercise legal claims and for the legitimate interests of the Bitkub Group Company or other stakeholders as set out in the personal data retention policy of the Bitkub Group Company. The Bitkub Group Company will delete or destroy the personal data or anonymize it 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 has expired.

7. Personal data security measures

The Bitkub Group Company values the security of your personal data. The Bitkub Group 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 may exercise any rights available to you under the Personal Data Protection Act B.E. 2562, and any other applicable laws, notifications, rules, or regulations, including the following:

- 8.1. **Right to withdraw consent:** You have the right to withdraw the consent to the Processing of your personal data previously given to the Bitkub Group Company at any time as while your personal data is stored by Bitkub Group Company. Please note that your withdrawal of consent will not affect the lawfulness of any processing that occurred prior to such withdrawal.
- 8.2. **Right to access your personal data and request to disclose the source of your personal data:** You have the right to request to access your personal data processed by Bitkub Group Company Process and to request that the Bitkub Group Company to disclose the source from which such personal data was obtained.
- 8.3. **Right to ratification:** You have the right to request the Bitkub Group Company correct any inaccurate or incomplete personal data, or not up to date.
- 8.4. **Right to erasure your personal data or anonymize information:** You have the right to request that the Bitkub Group Company erase, destroy your personal data or anonymize your personal data where it is no longer necessary for the purposes determined by the Bitkub Group Company.
- 8.5. **Right to restriction of Processing your personal data:** You have the right to request the Bitkub Group Company temporarily restrict the Processing of your personal data where the Bitkub Group Company is verifying a request for rectification or considering an objection to the processing of Personal Data, or where the Company is no longer

required to retain the Personal Data and is required by applicable law to erase or destroy it, but the employees request that the processing be restricted instead..

8.6. The right to information portability in the form of automated mean: You have the right to request to transfer your personal data by automated mean to another data controller, unless such transfer cannot be carried out due to technical limitation.

8.7. The right to object the Processing: You have the right to object to the processing of their personal data in certain circumstances.

You may not be able to exercise the rights set out above, or the exercise of certain rights may be subject to a fee, where:

- 1) the request is contrary to, inconsistent with, or does not comply with the rights prescribed under the Personal Data Protection Act B.E. 2562 (2019), or any other applicable laws or notifications;
- 2) the request is contrary to applicable law or a court order;
- 3) the exercise of the right may adversely affect the rights and freedoms of other persons;
- 4) the right is exercised in bad faith, is excessive, or is unreasonable; or
- 5) the exercise of the right may affect an investigation, the exercise of rights in judicial proceedings, or court proceedings or adjudication.

You may exercise their rights by submitting a request to people@bitkub.com. Further information regarding the exercise of your rights, including the relevant request forms, is available at: <https://www.bitkubcapital.com/privacy-notice>

9. 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 or the Bitkub Group Company immediately.

10. Right to investigate and file a claim

In the event that you find that the Bitkub Group Company has incorrectly Processed your personal data or that the personal data breach has occurred, you have the right to lodge a complaint to the expert committee which is responsible for considering the complaint under the Personal Data Protection Act B.E.2562. You also have the right to bring civil or criminal proceedings, as well as to request an investigation into any act that may constitute a violation of personal data protection law, in accordance with your rights under applicable law.

11. Contact Details

- **Bitkub Capital Group Holdings Co., Ltd.** 2525, FYI Center Tower 2, 11th Floor, Unit 2/1101-2/1107, Rama 4 Road, Khlong Toei Sub-district, Khlong Toei District, Bangkok 10110 Tel. 02-032-9533 email: people@bitkub.com
- **Data Protection Officer** 2525, FYI Center Tower 2, 11th Floor, Unit 2/1101-2/1107, Rama 4 Road, Khlong Toei Sub-district, Khlong Toei District, Bangkok 10110 email: dpo_bcgh@bitkub.com

This Privacy Notice is updated in December 2025

Document Revision History

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 Version 2025-1
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Revision No.	Approval Date	Description of Changes	Approved By
1	25 November 2024	Policy review with no substantive amendments - added the list of affiliated companies.	DPO Committee
2	25 December 2025	Policy review with no substantive amendments - added the list of affiliated companies.	DPO Committee