

KUNKWAN GROUP

GLOBAL PRIVACY STATEMENT AND PERSONAL DATA PROTECTION NOTICE

Version: 1.0

Effective Date: 01/06/2026

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1. INTRODUCTION

The Kunkwan Group respects your privacy and is committed to protecting the Personal Data entrusted to us.

This Global Privacy Statement and Personal Data Protection Notice (“Privacy Statement”) explains how the Kunkwan Group collects, uses, stores, shares, transfers, retains and otherwise processes Personal Data in connection with our global operations, educational services, products, platforms, applications, events, investor relations activities and other business operations.

The Kunkwan Group operates in multiple jurisdictions and is committed to processing Personal Data responsibly and in accordance with applicable privacy and data protection laws.

2. SCOPE OF APPLICATION

This Privacy Statement applies to all companies, subsidiaries, affiliates, branches, representative offices, joint ventures and other entities that are directly or indirectly controlled by, controlling, or under common control with the Kunkwan Group, whether existing now or established in the future (collectively referred to as the “Kunkwan Group”, “Kunkwan”, “we”, “us” or “our”).

This Privacy Statement applies to Personal Data collected through or in connection with:

- Websites operated by or on behalf of the Kunkwan Group;
- Learning Management Systems (LMS);
- Mobile applications;
- Investor portals;
- Customer portals and online communities;
- Social media channels;
- Events, seminars and competitions;
- Educational programmes and services;
- Products and subscriptions;
- Customer support services;
- Recruitment activities;
- Investor relations activities;
- Business partnerships;
- Offline interactions and communications; and
- Any other products, services, platforms or activities operated by or on behalf of the Kunkwan Group.

3. DEFINITIONS

For the purposes of this Privacy Statement:

“Personal Data” means any information relating to an identified or identifiable individual.

“Sensitive Personal Data” means Personal Data that may be considered sensitive under applicable laws, including but not limited to information relating to health, biometric information, government-issued identification numbers, financial account information, information concerning minors and any other categories of information designated as sensitive under applicable laws.

“Processing” means any operation performed on Personal Data, whether by automated means or otherwise, including collection, recording, organisation, storage, adaptation, retrieval, consultation, use, disclosure, transfer, restriction, deletion or destruction.

“Data Subject” means any individual whose Personal Data is processed by the Kunkwan Group.

4. CATEGORIES OF PERSONAL DATA WE MAY COLLECT

Depending on the nature of our relationship with you, we may collect and process:

Identification Information

- Full name;
- Identification number;
- Passport information;
- Nationality;
- Date of birth;
- Gender;
- Photographs and profile images.

Contact Information

- Email address;
- Telephone number;
- Mailing address;
- Country and city of residence;
- Emergency contact information.

Educational Information

- Educational background;
- Language proficiency;
- Course enrolment information;
- Learning progress;
- Assessment results;
- Attendance records;
- Certifications and achievements.

Employment and Professional Information

- Company name;
- Position and designation;
- Employment information;
- Professional qualifications;
- Curriculum vitae and resumes.

Financial Information

- Billing information;
- Payment records;
- Bank account information;
- Transaction history;
- Tax-related information where applicable.

Technical Information

- IP address;
- Device identifiers;
- Browser information;
- Operating system information;
- Login records;
- Website usage information;
- Mobile application usage information.

Marketing and Communication Information

- Communication preferences;
- Survey responses;
- Feedback and complaints;
- Records of communications and enquiries;
- Event registrations;
- Newsletter subscriptions.

Investor Information

- Investment enquiries;
- Shareholding information;
- Due diligence information;
- Investor communication preferences;
- Information required for legal, regulatory or compliance purposes.

Audio, Visual and Recording Information

- Photographs;
- Audio recordings;
- Video recordings;
- CCTV recordings where applicable;
- Media content voluntarily submitted by users.



Other Information

Any other information voluntarily provided by you or reasonably required for our legitimate business operations.

5. SOURCES OF PERSONAL DATA

We may collect Personal Data directly or indirectly from:

- You;
 - Parents, guardians or authorised representatives;
 - Employers and educational institutions;
 - Business partners and referral partners;
 - Service providers;
 - Social media platforms;
 - Publicly available sources;
 - Marketing campaigns;
 - Events and seminars;
 - Investor engagement activities;
 - Recruitment processes;
 - Third-party platforms;
 - Companies within the Kunkwan Group; and
 - Any other lawful sources.
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6. PURPOSES OF PROCESSING

We may process Personal Data for one or more of the following purposes:

- Providing educational programmes, products and services;
 - Operating websites, applications and digital platforms;
 - Managing registrations, subscriptions and user accounts;
 - Communicating with users and providing customer support;
 - Managing enquiries, feedback and complaints;
 - Conducting marketing, promotional and communication activities;
 - Organising events, competitions and community activities;
 - Conducting investor relations, fundraising and shareholder communications;
 - Managing recruitment and employment relationships;
 - Conducting business administration and operational activities;
 - Conducting audits, risk assessments and internal reviews;
 - Preventing fraud, misconduct and unauthorised activities;
 - Protecting legal rights and interests;
 - Complying with legal, regulatory and contractual obligations; and
 - Improving products, services and business operations.
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7. LEGAL BASIS OF PROCESSING

Where required by applicable laws, Personal Data may be processed based on one or more lawful grounds, including:

- Consent;
- Performance of a contract;
- Compliance with legal obligations;
- Legitimate business interests;
- Protection of vital interests;
- Public interest; or
- Any other lawful basis permitted under applicable laws.

8. MARKETING COMMUNICATIONS

The Kunkwan Group may send information regarding educational programmes, products, services, events, promotions, investor activities and other business initiatives through various communication channels, including email, telephone calls, messaging applications, social media platforms, mobile applications and other lawful communication methods.

Where required by applicable laws, we will obtain your consent before sending marketing communications.

You may withdraw your consent or opt out of receiving marketing communications at any time.

9. ARTIFICIAL INTELLIGENCE AND AUTOMATED TECHNOLOGIES

The Kunkwan Group may utilise analytics tools, artificial intelligence, machine learning and other automated technologies to improve products and services, personalise user experiences, enhance educational experiences and facilitate operational efficiencies.

Such technologies are not intended to produce decisions having legal or similarly significant effects on individuals unless permitted under applicable laws.

Where required by applicable laws, appropriate safeguards will be implemented.

10. COOKIES AND SIMILAR TECHNOLOGIES

We may use cookies and similar technologies, including analytics, advertising and tracking technologies, to:

- Remember user preferences;
- Maintain website functionality;



- Analyse website performance;
- Measure marketing effectiveness;
- Improve products and services; and
- Personalise content and communications.

You may manage cookie preferences through your browser settings or other available mechanisms. Certain features may not function properly if cookies are disabled.

11. SHARING AND DISCLOSURE OF PERSONAL DATA

We may share Personal Data with:

- Companies within the Kunkwan Group;
- Educational partners;
- Business partners;
- Service providers;
- Technology and cloud service providers;
- Payment service providers;
- Marketing and communication service providers;
- Recruitment service providers;
- Professional advisers, including auditors, accountants and legal advisers;
- Government authorities and regulators;
- Law enforcement agencies;
- Courts and dispute resolution bodies; and
- Any other parties where disclosure is permitted or required by applicable laws.

Recipients of Personal Data are required to implement reasonable safeguards and process Personal Data only for authorised purposes.

12. INTERNATIONAL TRANSFER OF PERSONAL DATA

As the Kunkwan Group operates internationally, Personal Data may be processed, stored or transferred across different jurisdictions in which the Kunkwan Group, its affiliates or service providers operate. The Kunkwan Group will implement reasonable and appropriate measures to ensure that Personal Data remains adequately protected in accordance with this Privacy Statement and applicable laws. Where local laws provide additional rights, impose additional obligations or contain mandatory provisions that differ from this Privacy Statement, such local laws shall prevail to the extent required.



13. SECURITY OF PERSONAL DATA

The Kunkwan Group implements reasonable administrative, organisational, technical and physical safeguards designed to protect Personal Data against accidental, unlawful or unauthorised access, collection, use, disclosure, alteration, loss or destruction.

Access to Personal Data is restricted to authorised personnel and service providers who require such access for legitimate business purposes.

While the Kunkwan Group implements reasonable safeguards to protect Personal Data, no method of transmission over the internet or electronic storage is completely secure. Accordingly, we cannot guarantee absolute security.

14. RETENTION OF PERSONAL DATA

The Kunkwan Group retains Personal Data only for as long as reasonably necessary to:

- Fulfil the purposes described in this Privacy Statement;
- Comply with legal and regulatory obligations;
- Resolve disputes;
- Enforce agreements; and
- Protect legitimate business interests.

Where Personal Data is no longer required, the Kunkwan Group may securely delete, anonymise or destroy such information.

15. YOUR RIGHTS

Subject to applicable laws, you may have the right to:

- Request access to Personal Data;
- Request correction of inaccurate Personal Data;
- Request deletion of Personal Data;
- Request restriction of processing;
- Object to certain processing activities;
- Withdraw consent;
- Request portability of Personal Data where applicable;
- Request information regarding our processing activities; and
- Lodge complaints with relevant authorities.

The Kunkwan Group may require verification of identity before responding to requests.



16. CHILDREN'S PRIVACY

Where Personal Data relating to minors is collected, the Kunkwan Group may require consent from a parent, guardian or authorised representative in accordance with applicable laws.

17. PHOTOGRAPHS, AUDIO AND VIDEO RECORDINGS

The Kunkwan Group may collect, use, reproduce and publish photographs, audio recordings and video recordings taken during courses, programmes, events, activities, competitions or through digital platforms for educational, operational, promotional, security, archival and other lawful business purposes, subject to applicable laws.

18. DATA BREACH MANAGEMENT

In the event of an actual or suspected Personal Data breach, the Kunkwan Group will investigate the incident and take appropriate measures to contain, assess and respond to the incident. Where required by applicable laws, notifications may be provided to affected individuals and relevant authorities.

19. THIRD-PARTY WEBSITES AND SERVICES

Our websites, applications and services may contain links to third-party websites or services. This Privacy Statement does not apply to such third-party websites or services, and we encourage you to review their respective privacy notices before providing Personal Data.

20. CHANGES TO THIS PRIVACY STATEMENT

The Kunkwan Group may amend, update or revise this Privacy Statement from time to time. Any updated version will become effective upon publication through our websites, applications or other communication channels unless otherwise stated.



21. CONTACT US

For any questions regarding this Privacy Statement or the processing of Personal Data, or to exercise any applicable rights, please contact:

Kunkwan Group

Email: support@kunkwan.com

Website: www.kunkwan.com

22. LANGUAGE

This Privacy Statement may be translated into multiple languages.

In the event of any inconsistency between language versions, the English version shall prevail unless otherwise required by applicable laws.

Version: 1.0

Effective Date: 01/06/2026

Owner: Kunkwan Group

Review Frequency: Annually or as required by applicable laws.

By accessing our websites, applications, platforms or services, you acknowledge that you have read and understood this Global Privacy Statement and Personal Data Protection Notice.