



Thailand's First Virtual Bank Moves Forward — CLICX Receives Approval from the Ministry of Finance and the BOT

Thailand's digital banking landscape is entering a new phase following the approval granted to CLICX Bank Public Company Limited ("CLICX"), a joint venture among Krunghthai Bank Public Company Limited (KTB), Advanced Info Service Public Company Limited (AIS/ADVANC), and PTT Oil and Retail Business Public Company Limited (OR), to operate as a branchless commercial bank, or Virtual Bank.

According to the announcement, on 14 May 2026, the Bank of Thailand notified CLICX that the Minister of Finance had granted approval for CLICX to operate a commercial banking business in the form of a virtual bank, together with permission to provide regulated payment services. CLICX is expected to commence operations in June 2026.

A virtual bank is a commercial bank that operates primarily through digital channels without physical branches. In practice, customers access banking services through mobile applications or online platforms. Unlike traditional banks, virtual banks are expected to rely more heavily on digital infrastructure, data analytics, artificial intelligence, and alternative data to provide financial services in a more accessible and personalized manner.

The CLICX model is introduced under the concept of "Bank in One CLICX", aiming to move beyond conventional digital banking toward "Beyond Banking" and Embedded Banking, where financial services are integrated into customers' daily lives. This may include savings, payments, financial management, and access to suitable credit products through digital channels.

The approval of CLICX is significant because it represents the practical implementation of Thailand's policy to modernize the financial sector and promote competition in banking services. Although virtual banks may operate without physical branches, they remain subject to the regulatory supervision of the Bank of Thailand, including requirements on financial stability, customer protection, risk management, cybersecurity, data governance, and responsible lending.

From a legal perspective, the virtual bank model also raises important compliance considerations, including:

1. A virtual bank must obtain approval to operate as a commercial bank and, where applicable, permission to provide regulated payment services. The approval granted to CLICX therefore reflects both banking and payment-service regulatory dimensions.
2. CLICX is expected to use alternative data and AI-driven analysis to assess customer behavior and creditworthiness. This creates opportunities for broader financial inclusion, but also requires careful compliance with personal data protection, consent, transparency, data accuracy, automated decision-making controls, and cybersecurity standards.
3. Since virtual banks are expected to serve unserved and underserved customers, including freelancers, daily workers, online merchants, and small businesses, customer protection will be a key regulatory focus. Credit products must be suitable, transparent, and consistent with customers' repayment ability.
4. The model aligns with the Bank of Thailand's policy direction on the use of data for consumer empowerment. However, financial institutions must ensure that customer data is used lawfully, securely, and only within the scope permitted by applicable law and customer consent.

Should you have any question, please do not hesitate to contact us via info@bgloballaw.com

