

# Privacy Policy

Janus Henderson Investors (also referred to throughout this policy as ‘Janus Henderson’, ‘we’, ‘us’, or ‘our’), is committed to protecting the privacy of current and prospective clients. After all your relationship with us is built on trust and our goal is to preserve that trust. We safeguard personal information by taking measures to maintain its confidentiality integrity, and security. This policy sets out the basis on which your information is collected, stored and used by us when you engage and interact with us.

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## Who we are and how to contact us

Janus Henderson collects and uses personal information in the ordinary course of business and is therefore responsible for ensuring that the handling and storage of your personal information is in compliance with all applicable data protection laws. This Privacy policy explains how your personal information may be held and used by companies within Janus Henderson. Note that information may be shared between Janus Henderson’s US and international subsidiaries.

If you have any questions or concerns regarding our Privacy policy, or how we process your personal information, please contact us via email at [privacy@janushenderson.com](mailto:privacy@janushenderson.com) or by postal service at:

Janus Henderson Investors  
Data Privacy Office  
151 Detroit Street  
Denver, CO 80206

## Information we collect

In this policy, “personal information” means all the non-public personal and financial information about you that we collect, use, share and store. Most of the information collected by us is information which you have provided to us directly, whether this is from you signing up online to receive information from us or by your providing information to us when becoming a client of ours.

Information we collect from you when you visit and/or request to receive information from our website:

- personal contact information (e.g. first name, family name, position in the company, company name, company email address, business phone number, business address, city, postcode and country);
- how you access and use our website or other digital services (e.g. your IP address, your location, the device and software being used, pages visited, content viewed, links and buttons clicked through); and
- information obtained from your mobile device may include coarse location, mobile phone number, mobile device type, and mobile device operating system version.

Information that we collect or generate about you includes:

- the Janus Henderson services or products which you have engaged with and our interactions with you;
- your visits to Janus Henderson websites including information collected through cookies that store technical information about the services that you use and how you use them.

If you are looking to become a client of ours, or are already a client of ours, in addition to the above, we may also collect or generate additional information about you. This includes:

- financial information associated with managing your account with us, including bank account numbers and account transactions;
- investment details including aims and/or objectives, and risk profile;
- regulatory requirements, such as country of tax residency, tax identification number, signature, death and marriage certificates, appointed power of attorney, appointed court of protection order, bankruptcy orders, change of name deed, and trust deed;
- information about other people you are financially linked to (e.g. your spouse) or who have an interest in or association with any of your accounts (e.g. where you have opened an account for the benefit of a child);
- new account information, including date of birth and/or age, city or country of birth, and nationality;
- employment status including whether you are employed, retired or receive benefits;
- proof of identification information, which may include a copy of your driver's license, passport, or other appropriate identification documentation (depending on what you provide to us); and
- any other relevant information provided by you to us in correspondence, whether by email, written letter, or telephone call.

There may be some instances where we receive information about you from a third party. This includes:

- information received when you use an investment professional to make an application with us;
- information received from any fraud protection agency in relation to you, your account or any of your investments;
- background checks including information from social media; and
- events which you registered for and/or attended that featured a Janus Henderson investment product.

Janus Henderson may use information that cannot be linked to or identify a particular individual such as anonymized or aggregated information. This information is not considered

personal information, and therefore, is not subject to this policy. This information is used to produce statistical research, reports, and other information that serves to enhance the products and services provided by us.

### How and why we use information

We process your information to the extent necessary for us to carry out investment activities, communicate with you, meet our regulatory obligations and for other legitimate business purposes permitted by applicable law. Your information may be stored and processed by us in the following ways and for the following purposes:

- opening of accounts, administering and managing your investment account(s) (as applicable), updating your records and tracing your whereabouts to contact you about your account;
- understanding your needs and interests;
- allowing you to use and access the functionality provided by our website services;
- communicating with you, where you have requested or consented, regarding any product or service or any other situation where you have engaged us to provide you with information;
- recording of incoming and outgoing calls for training, monitoring, and security purposes;
- ensuring the security of your investments by obtaining and/or verifying instructions either directly from you or through an agent appointed to act on your behalf;
- notifying you about any change to your investments, and/or to contact you about and enable you to exercise any rights in relation to your investments;
- investigating any complaint, dispute and/or any concerns relating to your investments and or activity on your account;
- identification verification, money laundering and other checks to confirm your identity and to ensure that the investments which we handle for you are done in compliance with our legal obligations;
- maintaining a register of investors;
- reviewing and improving the performance of our website and your use of it (including any personalisation which you may have indicated and which we have retained using cookies (refer to our [Cookie Policy](#) for additional information));
- managing and administering our business;
- complying and assessing compliance with applicable law, rules and regulations and internal policies and procedures;
- administering and maintaining databases that store information;
- anonymisation that enables us to undertake market research, analysis and developing statistics from information that is not referenced to a specific individual;
- for marketing communications (where it is lawful for us to do so and where you have not objected to the use of your information for these purposes);
- to carry out searches at fraud protection agencies pre-application, at the application stage, and periodically after that; and
- to deal with requests from you to exercise your rights under data protection laws.

Whenever we use information, we make sure that the usage complies with all applicable laws.

## Sharing of your information

We may share your information within Janus Henderson (both in the US and internationally) for the purposes described above. All of our employees and contractors are required to follow our data privacy and security policies when handling personal information.

We may also share your personal information outside of Janus Henderson, only for the purposes described above and under the following circumstances.

*Legal obligations:* we share information (i) to the extent that we are required to do so by applicable law, by a governmental body or by a law enforcement agency, or for crime prevention purposes (including fraud protection); (ii) in connection with any legal proceedings (including prospective legal proceedings); or (iii) in order to establish or defend our legal rights.

*Service providers:* we share information with service providers who perform services for us (including cloud services, data storage, sales, marketing, investigations, and customer support). Our contracts with our service providers include commitments that they agree to limit their use of information and to comply with privacy and security standards at least as stringent as the terms of our Privacy policy. We will include instructions for "unsubscribing" in our marketing and/or research related email communications. In addition, if we contact you via telephone, mail, or email in relation to a survey, you can indicate to us that you would prefer not to receive any additional calls of that nature in the future or to participate in that particular survey.

*Third-party relationships:* we share your information with affiliated third parties including financial institutions such as investment advisors and transfer agents. These third parties will be subject to appropriate data protection obligations and will only use your information as described in our Privacy policy.

*Consent:* when you request that we share your information with someone else (for example if you engage the services of a professional advisor after you have become a client of ours and request that we provide information about your account to that professional advisor) or when we have otherwise obtained your consent. If we share information other than as permitted or described above, we will provide you with a choice to opt-in to such sharing and you may choose to instruct us not to share the information.

*Business sale:* if we sell some or all of our business or assets we may need to disclose your information to a prospective buyer for due diligence purposes. If we are acquired by a third party, the information held by us about you will be disclosed to the third-party buyer. We do not disclose, and do not intend to disclose, non-public personal or financial information to non-affiliated third parties with respect to persons who no longer maintain a relationship with Janus Henderson.

**We do not sell your non-public personal or financial information without your consent.**

## Right to opt out

Janus Henderson is not in the practice of selling or distributing non-public information to third parties. If, in the future, our business directs us to do this, you will be notified and given the opportunity to opt out of having this information shared.

## **Updating and correcting your account information**

You may submit a written request to us to correct or amend any information in our records. If you have shares held directly with Janus Henderson, you can correct, update or confirm your personal information anytime on [janushenderson.com](http://janushenderson.com) by going to “My Account” and select “Account Profile”. Or, you can call a Janus Henderson Representative at (800) 525-3713.

## **Data retention**

We will retain your personal information for a period of time that is consistent with the original purpose of the data collection or as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. We rely on an established retention schedule to determine the minimum period for retaining the information.

## **Children under the age of 18**

We do not knowingly collect personal information from children under 18. If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at the details listed above.

## **Digital Privacy**

When you interact with us by using our websites, online services, or mobile applications that are owned and managed by Janus Henderson, personal information is collected, stored, and processed in accordance with the practices and safeguards described within this Privacy Policy.

### **Websites**

We may collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this notice.

Our websites may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

### **Cookies and similar technologies**

Janus Henderson and our third-party service providers may use cookies and similar technologies (“cookies”) to support the operation of our websites, online services, and mobile applications. Cookies are files with a small amount of data that are commonly used as anonymous unique identifiers. These are sent to your browser from the websites that you visit and are stored on your device’s internal memory. For more information on how Janus Henderson uses cookies, please refer to our Cookie Policy.

Some internet browsers have incorporated “**Do Not Track**” features. Most of these features, when turned on, send a signal or preference to the web sites you visit indicating that you do not wish to be tracked. Janus Henderson does not respond to Do Not Track signals and will continue to track your Internet Protocol (IP) address for our internal reporting purposes.

### **Mobile application service**

If you choose to use the mobile application service (“mobile app service”), then you agree to the collection and use of information in relation to this Policy. The information that we collect is used for providing and improving the service. We will not use or share your information with anyone except as described in this Policy.

Information obtained from your mobile device may include coarse location, mobile phone number, mobile device type, and mobile device operation system version. The mobile app service is not intended for use by children under 18 years of age, nor by non-US residents, and we do not knowingly collect personal information from these individuals. If we learn we have collected or received personal information from without parental consent or from non-US residents, we will delete that information. If you believe we might have any information from or about these categories of individuals please contact us at the details listed above.

The mobile app service does use third party services that may collect information used to identify you. Links to the privacy policies of the service providers used by the mobile app service are:

- [Google Play Services](#)
- [Apple](#)
- [Adobe](#)

The mobile app service does not use cookies explicitly. However, the app may use third party code and libraries that use cookies to collect information and improve their services. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your device. If you choose to refuse our cookies, you may not be able to use some portions of this service.

### **Log data**

Whenever you use the mobile app service, in a case of an error in the app we collect data and information (through third party products) on your phone called Log Data. This Log Data may include information such as your device Internet Protocol (“IP”) address, device name, operating system version, the configuration of the mobile app when utilizing the service, the time and date of your use of the service, and other statistics.

### **Security**

We have physical, administrative, procedural and technical safeguards in place to protect your information from unauthorised access, use or disclosure. We also contractually require that our third-party service providers protect such information to the security standards at least as stringent as the terms of our Privacy policy. We regularly adapt these controls to respond to changing requirements and advances in technology.

As a condition of employment, Janus Henderson employees are required to follow all applicable laws and regulations, including data protection laws. Access to non-public information is limited to those employees who need it to perform their roles. Unauthorised use

or disclosure of confidential client information by a Janus Henderson employee is prohibited and may result in disciplinary measures.

We restrict access to personal information to those who require it to develop, support, offer and deliver products and services to you.

### Important information for California residents

This additional information is being provided as required by the California Consumer Privacy Act of 2018 (the "CCPA") and the California Privacy Rights Act of 2020 (the "CPRA"). California residents are offered specific privacy rights, including the right to:

- **Know what personal information** we collected about you during the last 12 months. We will provide you with the list of categories of personal information collected, categories of sources from which that information was collected, the business purposes(s) for which the information was collected, the categories of third parties with whom we share the personal information, and the specific pieces of personal information collected, as described in our Privacy policy.
- **Request the deletion** of your personal information collected or maintained by us. Please note that there may be circumstances where you request us to delete your information, but we are legally entitled to retain it.
- **Receive equal treatment** for exercising these rights (i.e., we shall not discriminate against you for exercising any of your rights).
- **Receive** this information in a readily assessable format.
- **Limit the use or disclosure** of your personal information. You have the ability to opt-out of our use and disclosure of personal information that falls under the category of "sensitive" personal information. Sensitive personal information includes government identification, finances, geolocation, race, religion, union membership, communications, genetics, biometrics, health, and sexual orientation.

We may collect sensitive personal information directly from you through surveys that you consent to participate in. The data is anonymized or aggregated and cannot be linked back to a particular individual. This aggregated information is used to produce statistical research, reports, and other information that serves to enhance the products and services provided by Janus Henderson.

As a California resident, you or an authorized agent acting on your behalf, may exercise your rights by submitting a verifiable request using one of our two options:

- Call our toll-free number +1 (833) 424-9993; or
- Click [here](#) to access our [online form](#)

Please note that we may need to verify your identity before we can fulfil your request. We will respond to your request within 45 days from the date of our receipt of your verifiable request. We will notify you if additional time is necessary to complete your request. If you are exercising access or deletion rights on behalf of another person, please either confirm that the person has authorized you to act as an agent with us or be prepared to provide proof that you have been designated as an authorized agent.

**Making changes to this information**

We'll keep this information up to date and you are advised to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page.

Last updated: November, 2023