

# **Privacy Policy**

Maintaining your privacy is important to Janus. That's why we take reasonable precautions to safeguard your personal information from unauthorized access. We are committed to keeping your personal information safe and secure.

# The Janus<sup>1</sup> Privacy Assurance

### 1. We do not sell your personal information without your consent

# 2. Collection and use of your nonpublic personal information

We may collect information such as name, address, email address, username and password, phone number, work experience, information related to references, education, skills and certifications/licenses. This information is collected via Janus.com or in paper documents.

Janus limits the use of your information to what is necessary to evaluate any application for employment, communicate with you, develop our recruitment process and fulfill any legal and regulatory requirements.

### 3. Nonpublic personal information Janus shares

Janus may share nonpublic information with employees, our affiliates or entities acting on behalf of the Janus employment application process for the purposes listed above. Janus protects this shared information with strict confidentiality agreements, which require service providers to keep information strictly confidential and use it only for its intended purposes.

Janus does not disclose, and does not intend to disclose, nonpublic personal information to nonaffiliated third parties except as permitted by law.

#### 4. Data Retention

Application information is retained in accordance with regulatory requirements. We may also retain application information to consider you for other jobs for which you may be qualified.

#### 5. Physical Security

Janus provides leading edge technology to reasonably ensure that all transmitted information is safe and secure. Information is stored on a secure record-keeping system that is located in secured areas of the buildings we occupy. All record-keeping systems are located in controlled areas, with physical access limited to authorized persons. Authorized personnel escort visitors into controlled areas at all times. Employees of Janus may, from time to time, have access to this information in order to fulfill our service commitment to you. However, physical access to the controlled areas is logged and each employee, upon employment with Janus, is required to sign a security agreement concerning their individual duty to safeguard confidential data.



### 6. Cookies

Janus or a third party service provider may assign your computer browser a unique random identifier called a "cookie." We will simply use the data collected by the cookie to improve your Janus website experience and to evaluate our website's services and features.

In addition, Janus may allow for a third party service provider, such as Google, Inc. in connection with Janus' use of Google Analytics, to track your online activities over time or across websites.

# 7. Do Not Track Signals

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 does not respond to Do Not Track signals and will continue to track your Internet Protocol (IP) address for our internal reporting purposes.

# **Policy Revisions**

Janus reserves the right to amend its policies at any time. Changes to the Privacy Policy will become effective upon posting to this site. You should review this Privacy Policy periodically to remain informed of any updates.

<sup>1</sup>This Privacy Policy applies to Janus Management Holdings Corporation, Janus Capital Management LLC, Janus Capital Group Inc., Janus Distributors LLC, Janus Services LLC, VS Holdings, Inc., Janus Capital Asia Limited, Janus Capital International Limited, Janus Capital Singapore Pte Limited, Janus Capital Taiwan Limited, Janus Capital (Switzerland) LLC, INTECH Investment Management LLC, Perkins Investment Management LLC,

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