

Janus Henderson Privacy Policy¹

Maintaining your privacy is important to Janus Henderson. That's why we take reasonable precautions to safeguard your personal information from unauthorized access. After all, your relationship with us is built on trust and our goal is to preserve that trust. Whether you visit our website or call an investment professional, rest assured that we are committed to keeping your personal information safe and secure.

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 your name, date of birth, address, email address, social security number ("SSN"), phone number, bank account information and account activity. This information is collected via written and electronic documentation, through information you furnish through our websites or call centers, or for Advisory clients, via an investment professional.

Janus Henderson limits the use of your information to what is necessary to: fulfill legal and regulatory requirements; provide you with superior service; alert you to products and services that may be of interest to you; occasionally conduct market-related research and surveys; facilitate the opening of accounts; and facilitate transactions in your account.

Janus Henderson will include instructions for "unsubscribe" in its marketing and/or research-related email communications. In addition, if Janus Henderson contacts you via telephone 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.

3. Nonpublic personal information Janus Henderson shares

Janus Henderson may share nonpublic personal information with our affiliates when processing transactions or managing accounts on your behalf or as otherwise permitted by law. This includes information such as name, date of birth, address, SSN, account activity and account balances.

4. Third-party relationships with Janus Henderson

The types of affiliated third parties with whom Janus Henderson shares information include institutions such as investment advisors, limited purpose broker-dealers, and transfer agents. Janus Henderson protects this shared information with strict confidentiality agreements and does not disclose, and does not intend to disclose, nonpublic personal information to nonaffiliated third parties except as permitted by law.

5. Information shared with service providers

Janus Henderson may share nonpublic personal information under servicing or joint marketing agreements with institutions such as service bureaus and application service providers. In all cases, your information is strictly protected. Each agreement requires that service providers keep the information strictly confidential and use it only for its intended purpose.

6. Information about former shareholders

Janus Henderson does not disclose, and does not intend to disclose, nonpublic personal information to nonaffiliated third parties with respect to persons who are no longer shareholders.

7. Right to opt out

Janus Henderson is not in the practice of selling or distributing nonpublic 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.

8. Security of Your Information

We have physical, administrative, procedural and technical safeguards in place to protect your privacy and we regularly adapt these controls to respond to changing requirements and advances in technology.

9. Access to information

Janus Henderson restricts access to personal information to those who require it to develop, support, offer and deliver products and services to you.

10. Cookies

When you visit our websites, we or a third party service provider may collect technical and navigational information, such as device type, browser type, Internet protocol address, pages visited, and average time spent on the websites. We use this information for a variety of purposes, such as maintaining the security of your online session, online advertising of our products and services, facilitating site navigation, improving our websites' design and functionalities, and personalizing your experience. Additionally, we use temporary and/or persistent cookies, web beacons and other similar technologies ("cookies") to support the operation of our websites. On their own cookies do not contain or reveal any personally identifiable information. However, if you choose to furnish us with personally identifiable information, this information can be associated with the data collected using the cookies.

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

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

12. Updating and Correcting Your Account Information

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

13. Policy Revisions

Janus Henderson 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.

14. Please send written requests to:

Chief Privacy Officer

Janus Henderson Investors
151 Detroit Street
Denver, CO 80206-4805

[†]This Privacy Policy applies to Janus Capital Management LLC, Janus Henderson Distributors, Janus Services LLC, Janus Detroit Street Trust, Clayton Street Trust, Janus Investment Fund, Janus Aspen Series, Henderson Investment Management Ltd., Geneva Capital Management, Janus Capital Pte Singapore Limited and Perkins Investment Management LLC. (May 2017)