



## Retail Privacy Policy

Maintaining your privacy is important to Janus. That's why we take every reasonable precaution 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. So whether you visit our website or call our service representatives, rest assured that we are committed to keeping your personal information safe and secure.

### The Janus' Privacy Assurance

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

#### 2. Collection and use of your nonpublic personal information

We collect information such as name, date of birth, address, email address, username and password, security questions and answers, SSN, phone number, bank account information and account activity. This information is collected via janus.com, Janus Xpressline™, Janus Service Representatives and our paper applications.

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

Janus will include instructions for 'unsubscribe' in its marketing and/or research-related email communications. In addition, if Janus 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 shares

Janus 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

The types of affiliated third parties with whom Janus shares information include institutions such as investment advisors and transfer agents. Janus protects this shared information with strict confidentiality agreements. Janus 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 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 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 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. Confidentiality, security and integrity**

##### **Physical Security**

Janus provides leading edge technology to 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.

##### **Online Security**

Doing business on our website means you will send and receive personal financial information over the Internet. It is crucial you make sure you are comfortable with Janus' efforts to safeguard your account information.



- Janus uses the latest encryption technology, Transport Layer Security (TLS), to protect private information transferred between your computer and Janus.
- You can establish a private 4-8 digit Personal Identification Number (PIN), which you can change anytime. That way, you control your PIN.
- You can terminate online access at any time, either online or by telephone. You can reestablish this access anytime as well. For added security, access revoked by telephone must be reestablished in writing.
- Just as with selling shares of your Janus funds over the telephone, the proceeds from selling shares online will be sent only to the address of record on the account or a pre-designated bank account.
- Online access will be suspended after three unsuccessful logon attempts.
- Sessions with janus.com are automatically terminated after 10 minutes of inactivity to prevent unauthorized access to your Janus account via your computer. If you'd like to continue after this point in time, simply log on again.

#### What is TLS?

TLS is the successor to the SSL technology originally developed by Netscape and adopted by all vendors producing web-related software. It's used to establish a secure connection between your computer and Janus' server. TLS allows you to transmit information in an encrypted manner, so all data transmitted between Janus and your computer will be completely encrypted even while traveling across multiple networks.

Encryption is achieved through an electronic scrambling technology (originally developed by RSA, Inc.) that uses "keys" to code and decode data. Basically, each party has a private "key" that no one can access, and a public "key" that can be passed back and forth. Information encrypted with a public key can only be decrypted with the associated private key. In other words, the information you send to Janus is encrypted using our public "key." It can only be decrypted by us with our private "key." The same goes for the information we send to your computer - we'll encrypt it using your public "key," but only you can decrypt it using the private "key" that you alone hold. To further enhance security, these "keys" are established at the beginning of your secure session with Janus and are used for that session only.



### Encryption and Online Security

When we talk about 128-bit encryption, we're referring to the length of the "keys" used to encrypt and decrypt data. The longer the key, the more secure the encrypted data. You could think of the key as a password, without which you can't decode a message. Basically, a 128-bit key is like a 16-character password (and virtually impossible to decode). To get the highest level of security, use a browser that supports TLS and 128-bit encryption.

### Browser Security

To establish a secure session with our websites, your browser must be TLS 1.0 or SSL 3.0 compliant. You'll need a web browser such as Mozilla Firefox or Microsoft Internet Explorer that supports 128-bit encryption. Many other web browsers will support encryption, but they may not provide the highest level of security available. To take full advantage of our website's security features, we strongly recommend upgrading to a web browser that supports TLS.

### Your Janus Password

Your Janus PIN and other security information are confidential. After creating your own PIN, you should never share this information with anyone. You should also change your Janus PIN periodically.

### Cookies

Janus or a third party service provider may assign your computer browser a unique random identifier called a "cookie." Doing so does not compromise your privacy or security in any way. 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.

### 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.

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.

### Updating and Correcting Your Account Information

The accuracy of your personal account information is important to us. You can correct, update or confirm your personal information anytime on janus.com by going to "My Account" and from the dropdown menu, selecting "Edit Information." Or, you can call a Janus Representative at (800) 525-3713.



### 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>For the purposes of this Privacy Policy, "Janus" includes Janus Capital Management LLC, Janus Distributors LLC, Janus Services LLC, Perkins Investment Management LLC, Janus Investment Fund and Janus Aspen Series.

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