



Advisor Privacy Policy

Maintaining your privacy is important to Janus. 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.

So whether you visit our website or call an investment professional, rest assured that we are committed to keeping your personal information safe and secure.

The Janus¹ 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, date of birth, address, email address, social security number ("SSN"), phone number, bank account information and account activity. This information is collected via an investment professional, electronic application or paper application.

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; and facilitate transactions in your account.

Janus will include instructions for "unsubscribing" 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 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.

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.

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.

¹This Privacy Policy applies to Janus Capital Management LLC, Janus Distributors LLC, and Perkins Investment Management LLC.

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