

PRIVACY POLICY

Janus Henderson Investors (Australia)

December 2023

Privacy policy

Last updated: 12 December 2023

Scope

Janus Henderson Investors (Australia) Limited (ABN 47 124 279 518) and its subsidiary entities Janus Henderson Investors (Australia) Funds Management Limited (ABN 43 164 177 244) and Janus Henderson Investors (Australia) Institutional Funds Management Limited ABN 16 165 119 531) (together “we”, “our”, “us” or “**Janus Henderson Australia**”) respects and seeks to protect your privacy and your personal information. We comply with the *Privacy Act 1988* (Cth) (“**Privacy Act**”) and the Australian Privacy Principles (“**APPs**”) in the Act and any other applicable privacy laws when handling personal information.

This Privacy Policy explains the way we manage, collect, use and disclose your personal information, including in relation to our website located at www.janushenderson.com. In this Privacy Policy, “**personal information**” means any information or opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in material form or not.

Collection of personal information

In the course of our business activities, we may collect and hold personal information about you. Most of the personal information collected by us is personal information which you have provided to us directly, whether this is from you signing up online to receive information from us or by you providing information to us when becoming a client of ours.

When you invest in a financial product that is offered by us, personal information about you (such as your name, postal address, date of birth, bank account information and tax file number) is collected primarily through our standard forms (such as our application form).

When you visit our website, we may collect technical and navigational information, such as device type, browser type, internet protocol address, pages visited, and average time spent, user journeys and demographics. Information is collected via our website through cookies that store technical information about the services that you use, and how you use them. For more information on the cookies used by us please see below under the heading “Dealing with Janus Henderson online”.

The types of personal information we collect may include your name, investor number, residential and postal address, phone number, email address, postcode and date of birth when you complete forms or sign up to publications on our website.

We collect your personal information for the purpose of:

- providing you with communications and marketing material;
- generating information about you to provide Janus Henderson Australia investment services or products;
- carrying out investment activities;
- interacting with you when you visit our website; and
- complying with our legal and regulatory obligations, including under Anti Money Laundering and Counter Terrorism Financing (“**AML/CTF**”) laws.

Janus Henderson Investors (Australia) Limited

Sydney office

Level 36, Grosvenor Place
225 George Street, Sydney, NSW 2000
T +61 2 8298 4000 F +61 2 8298 4001

Melbourne office

Level 30
101 Collins Street, Melbourne, VIC 3000
T +61 2 8298 4000 F +61 3 8538 7151

Brisbane office

Level 37, Riparian Plaza
71 Eagle Street, Brisbane, QLD 4000
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As a specialist investment manager, we do not typically collect sensitive information (for example health information or information about any criminal record). However, in the event we consider the collection of this sensitive information is necessary, we will seek your prior consent and we will only collect, use and disclose sensitive information in accordance with the APPs.

There may be some instances where we receive your personal information from a third party. This includes personal information received from your brokerage or financial advisory firm, and/or when you use a financial adviser to make an application with us, personal information received when you are being screened to comply with AML/CTF laws, and personal information received when you register for and/or attend events that featured a Janus Henderson investment product.

Use and disclosure of personal information

We may use or disclose your personal information for the purpose for which it was collected and or for a purpose you consent to or if we are authorised or required by an Australian law.

We may process further anonymised or de-identified information and data that is not processed by reference to a specific individual. For example, information may be converted into statistical or aggregated data which cannot be used to re-identify you. It may then be used to produce statistical research and reports which may be shared within Janus Henderson. This information may be used by us to analyse the efficacy of our marketing campaigns, improve our products and services, and improve our website design and functionality.

We may disclose your personal information to our related companies within the Janus Henderson Investors group of companies (both in Australia and internationally) who assist us in supplying our services or manage and administer investments, handle complaints, or supply administrative or other functions on our behalf. All of our employees and contractors are required to follow our global data privacy and security policies when handling personal information.

We may also disclose your personal information to others in the following circumstances:

- where we outsource some of our administrative and related functions to external third parties;
- to relevant Government bodies to meet our legal and regulatory obligations (such as ASIC, ATO, AUSTRAC or a law enforcement agency);
- with your prior consent to parties authorised by you such as a licensed financial adviser or dealer group;
- to any joint holder of an investment; and
- to a third party buyer for due diligence purposes if we sell some or all of our business or assets.

We use third party software, investment administrators and registries to support the administration of our financial products. We have contractual arrangements with these service providers to ensure they comply with the Privacy Act and the APPs when dealing with your personal information.

Some of the recipients to whom we disclose your personal information may be located outside of Australia. The countries in which the recipients are likely to be located include India, the Philippines, the United States and United Kingdom.

We will not sell your personal information to other organisations and will not provide parties external to Janus Henderson Australia with your personal information for purposes unrelated to the purpose for which it was collected, or to comply with our legal or regulatory obligations.

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Direct marketing

If you consent to receiving direct marketing from us in order for us to tell you about our products, services, offers, investment or events that we think may be of interest to you, we may use your personal information to contact you by mail, email or SMS for direct marketing. You can contact us at any time to opt out of receiving direct marketing, or using the unsubscribe function in the email or SMS, if you do not wish to receive such materials or information.

Accessing and correcting personal information

If you feel your personal information is not accurate, complete or up to date, please notify us. If we are satisfied that any personal information we hold about you is inaccurate, incomplete, out of date, misleading or irrelevant (having regard to the purpose for which it is held) we will take reasonable steps to correct that personal information. If we do not agree that your personal information needs correction, you may ask that we attach a statement to this effect to our record.

You may also request access to your personal information (subject to certain legal exceptions). If a legal exception applies and we decide not to provide you with access to any personal information we hold about you, we will advise you of the reasons for our decision and how you can complain.

Please contact our Privacy Office at:

Privacy Office

Level 36, Grosvenor Place
225 George Street
Sydney NSW 2000

By email at Privacy@janushenderson.com

By calling our Sydney office on +61 2 8298 4000.

Integrity, security and storage of personal information

We will take reasonable steps to keep your personal information secure and take all reasonable steps to safeguard your personal information from misuse or loss, and unauthorised access, modification or disclosure, and to ensure that the personal information we collect and hold about you is correct. To assist us, please ensure that the information you provide is accurate, up-to-date, and complete and let us know if your details change.

We have physical, electronic and procedural safeguards to protect your information which is held by us. For example, your personal information is stored in secured office premises, electronic databases requiring logins and passwords for access and/or at one of our secured warehouses, we use encryption when transmitting personal information, firewalls, and intrusion detection systems to help prevent unauthorised persons from gaining access to the personal information. Access to information stored electronically is restricted to staff whose job purpose requires access. As a condition of employment, Janus Henderson employees are required to follow all applicable laws and regulations, including data protection laws. Access to sensitive 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. If you believe that the personal information we hold about you has been subjected to any misuse or unauthorised access, modification or disclosure, please let us know we can investigate and take appropriate steps.

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We will retain information as needed to fulfil the purposes for which it was collected. We will retain and use your information as necessary to comply with our business requirements, legal obligations, resolve disputes, protect our assets, and enforce our agreements. We will not retain your information for longer than is reasonably necessary. If we hold personal information about you that is no longer needed for any purpose for which we are permitted to use or disclose it, we will take reasonable steps to destroy or permanently de-identify that personal information.

Can you deal with Janus Henderson anonymously?

We are a financial services provider subject to strict regulatory requirements. We thus do not provide our products and/or services to clients on an anonymous basis. General enquiries however can be made on an anonymous basis.

Dealing with Janus Henderson Online

We may use “cookies” to help us tailor our website to better suit your needs (e.g. cookies to enable us to save any personal preferences indicated by you) and to provide more effective web navigation.

A cookie is a small data file that contains information about your visit to our website. This information is provided by your computer during your first visit to our website. Our server records this information in a text file and stores this file on your hard drive. When you visit our website again, our server looks for the cookie and may structure itself based on the information contained in the cookie. A cookie only identifies your computer when you visit our web site; it does not identify you. Refer to our global [Cookie Policy](#) for further information.

Contacting us

If you have any questions about this Privacy Policy or wish to make a complaint about how we have handled your personal information, please contact our Privacy Office (contact details provided above.) If you make a complaint, we may need to verify your identity and request further information in order to respond. We will provide a response within a reasonable period of time.

We will endeavour to answer any questions, correct any error on our part or resolve any complaint you may have about our information handling practices. If we do not resolve a complaint to your satisfaction, you may refer the matter to the Office of the Australian Information Commissioner (“**OAIC**”). The OAIC has the power to investigate the matter and make a determination.

Please note the OAIC generally requires that any complaint must first be made to the respondent organisation. The law also allows 30 days for the respondent organisation to deal with the complaint before a person may make a complaint to the OAIC.

The Commissioner can be contacted at:

Office of Australian Information Commissioner

GPO Box 5288
Sydney NSW 2001
Phone: 1300 363 992
www.oaic.gov.au

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Changes to this Privacy Policy

We may, from time to time, amend this Privacy Policy, in whole or part, in our sole discretion. Any changes to this Privacy Policy will be effective immediately upon the posting of the revised Privacy Policy on our website. Depending on the nature of the change, we may announce the change on our website. By continuing to access our services following any changes, you will be deemed to have agreed to such changes. If you do not agree with the terms of this Privacy Policy, as amended from time to time, in whole or part, you must not access our services including our website.

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