

JANUS HENDERSON INVESTORS RECRUITMENT PRIVACY STATEMENT

This statement applies where we are acting as a data controller with respect to your information as a prospective employee of Janus Henderson; in other words, where we determine the purpose and means of the processing of that information. This statement sets out the basis on which your information is collected, stored and used by us.

In this statement, “**we**”, “**us**” and “**our**” means Janus Henderson Group plc (reg. 101484) and its subsidiaries.

If you have any questions or concerns regarding our Recruitment Privacy Statement, or how we collect, use, transfer or process your information, please contact us via email at privacy@janushenderson.com or by postal service at:

Janus Henderson Investors
Data Privacy Office
201 Bishopsgate
London
EC2M 3AE
United Kingdom

1. Personal information that we collect, store and use about you

By “**personal information**” we mean all of the personal and financial information about you that we collect, use, share and store. Most of the information collected by us is information which you have provided to us directly in connection with your application for a job with us.

We will collect or generate and process the following personal information about you, which may include information about you that you give to us by filling in forms or by communicating with us, whether face-to-face, by phone, e-mail or otherwise through the recruitment process with us. This information may include, to the extent applicable:

- your full name, previous names, date of birth, national insurance number, nationality, education and qualification details, professional membership, curriculum vitae, references, current salary information including benefits and pension entitlements, marital status, home address and home telephone number, email address, mobile telephone number, next of kin, emergency contact details, bank account details for the transfer of your salary and other benefits, tax details and your date of hire;
- passport details, visa, photograph, birth certificate to carry out right to work checks;
- work-related details such as your job position, interview notes, contact details, and service history;
- results of psychometric tests;
- gender, religion, sexual orientation, marital status, age, disability, ethnicity information to conduct diversity and inclusion studies across our firm; and
- disability information that may be required for us to make reasonable adjustments during the recruitment process.

In addition, we may obtain the following information from other sources:

- applicant information from Recruitment Agencies or our other affiliates; and

- pre-employment checks; including information from previous employers, criminal record check and credit reference agencies. We will only conduct pre-employment checks once an offer of employment has been made and we will provide you with further details of this prior to doing so.

2. Uses of your personal information

Your personal information may be stored and processed by us in the following ways and for the following purposes:

- we use your personal information during the recruitment stage to assess your application and your suitability and fitness for the role you have applied for and to decide whether to enter into a contract with you;
- we will use the contact details you provide to contact you to progress your application;
- where necessary, to meet our legal and regulatory obligations. For example, we use your personal information to conduct pre-employment checks;
- we may ask for your consent to provide us with particularly sensitive information such as religion, sexual orientation, disability, and ethnicity data in order to help us perform diversity and inclusion evaluations which helps inform our equal opportunities policy; and
- to discharge our legal and regulatory obligations;
- in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings; or
- where the processing is necessary for our legitimate business interests (or the legitimate interests of one or more of our affiliates), such as:
 - allowing us to effectively and efficiently administer and manage the operation of our business;
 - ensuring a consistent approach to the management of our job candidates and the job candidates of our affiliate companies worldwide;
 - maintaining compliance with internal policies and procedures; or
- in certain circumstances you will have given your consent to us to use your personal data.

We will not share any of the information you provide with any third parties for marketing purposes.

3. Disclosure of your information to third parties

We may disclose your personal information to our affiliates for the purposes of:

- the management and administration of our business and our affiliates' business;
- complying with the functions that each of them may perform relating to regional or global HR decisions;
- assessing compliance with applicable laws, rules and regulations. We will take steps to ensure that the personal information is accessed only by employees of our affiliates that have a need to do so for the purposes described in this statement.

We may also share your personal information with third parties outside of our corporate group for the following purposes:

- if we sell any of our business or assets, in which case we may disclose your personal data to the prospective buyer for due diligence purposes;
- if we are acquired by a third party, in which case personal information held by us about you will be disclosed to the third party buyer;
- to comply with regulatory obligations we may share your details with local regulators;
- to third parties that help us conduct pre-employment screenings; and
- to the extent required by law, for example if we are under a duty to disclose your personal information in order to comply with any legal obligation, establish, exercise or defend our legal rights.

4. Transfers of personal information

The personal information that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“**EEA**”) and/or outside your country of citizenship or residency. It may also be processed by individuals who work for our affiliates or for one of our suppliers.

Where we transfer your personal information outside the EEA and/or outside your country of citizenship or residency, we will ensure that it is protected and transferred in a manner consistent with legal requirements. This can be done in a number of ways, for instance:

- the country that we send the information to might be approved by the European Commission or the relevant data protection authorities as offering a sufficient level of protection;
- the country that we send the information to may subscribe to an “international framework” intended to enable secure data sharing;
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal information in accordance with specific standards; or
- in other circumstances the law may permit us to otherwise transfer your personal information outside the EEA and/or outside your country of citizenship or residency. In all cases, however, we will ensure that any transfer of your personal information is compliant with applicable data protection laws.

You can obtain more details about the protection given to your personal information when it is transferred outside the EEA (including a copy of the standard data protection clauses which we have entered into with recipients of your personal data) by contacting us via the methods described above.

5. Retention of personal information

How long we hold your personal information for will vary. The retention period will be determined by the following criteria:

- the purpose for which we are using your personal information – we will need to keep the data for as long as is necessary for that purpose;

- whether we must comply with laws or regulation which set a minimum period for which we have to keep your personal information; and
- whether we are required to retain your personal information for the purposes of resolving disputes, protecting our assets, and/or enforcing our rights under contractual agreements.

Once the retention period has been met, we will either permanently destroy, delete or anonymise your personal information.

6. Your rights

Under applicable data protection laws, you have a number of legal rights in relation to the personal information that we hold about you. These rights include to:

- be informed about the processing of your information;
- have your information corrected if it is inaccurate and to have incomplete information completed;
- object to or restrict processing of your information. Please note that there may be circumstances where you object to, or ask us to restrict our processing of your information but we are legally entitled to refuse that request;
- in the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, withdraw your consent for that specific processing at any time. Please note, however, that we may still be entitled to process your information if we have another legitimate reason for doing so (e.g. we may need to retain information to comply with a legal obligation);
- in certain circumstances, have your information erased. Please note that there may be circumstances where you ask us to erase your information but we are legally entitled to retain it;
- request access to your information and to obtain information about how we process it;
- move, copy or transfer your information;
- receive some information in a structured commonly used and machine-readable format and/or request that we transmit that data to a third party where technically feasible. Please note that this right only applies to information which you have provided directly to us and may not always apply;
- lodge a complaint with the relevant data protection regulator if you think any of your rights have been infringed. As our European headquarters are in the UK, you can also contact the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk> ; and
- be informed how your information is used in relation to automated decision making which has a legal effect on or otherwise significantly affects you.

In most circumstances, you can exercise your rights free of charge by submitting an online [request](#) or contacting us using the details set out above.

7. Security Measures

We have put in place physical, administrative, procedural and technical safeguards to protect your information from unauthorised access, use or disclosure. We also contractually require that our third party service providers protect such information to the standard required by applicable data protection laws. We regularly adapt these controls to respond to changing requirements and advances in technology.