

# THE ATHENA FINANCIAL GROUP

## Privacy Policy

Your personal identification, account and holdings data are disclosed to your Advisor to enable your Advisor to help determine the Program Investments that are suitable for you.

Your Advisor provides the custodian with access to the following client related information: (i) account opening documents (which include, among other things, your investment objective, risk tolerance and any account restrictions you imposed on management of assets); (ii) your investment guidelines (if applicable); and (iii) reports relating to the performance of your account.

We share your personal account data in accordance with our privacy policy detailed below.

### **Privacy Notice:**

We have adopted the following privacy policy: Maintaining your trust and confidence is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of Athena Advisory Services, Inc.

### **Information We Collect:**

In connection with providing investment products, financial advice, or other services, we obtain non-public personal information about you, which may include:

- Information we receive from you on account applications, such as your address, date of birth, Social Security Number, occupation, financial goals, assets and income;
- Information about your transactions with us, our affiliates, or others; and
- Information received from credit or service bureaus or other third parties, such as your credit history or employment status.

### **Categories of Parties to Whom We Disclose:**

We will not disclose information regarding you or your account with us, except that we may disclose under the following circumstances:

- To authorized Financial Advisor and his/her manager;
- To our affiliates, to the extent permitted by law;
- To entities that perform services or function on our behalf, including financial service providers, such as an investment company or insurance company.;
- To consumer reporting agencies;

- To third parties who perform services on our behalf; To your attorney, trustee, or anyone who represents you in a fiduciary capacity; To our attorneys, accountants, or auditors; and To government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

We do not sell client lists or client information to third parties.

We disclose non-public personal information about you in connection with the transfer of your account to another financial institution at your request or the request of your Advisory Representative.

If you reside part-time or full-time in a state that requires your affirmative consent before we provide your non-public personal information to certain third parties - such as in connection with the transfer of your Advisory Representative to another financial institution - we will obtain such consent as required.

### **How We Use Information:**

Information is to be used among the affiliate companies that perform support services for us, such as data processors, technical systems consultants and programmers, or companies that help us market products and services to you for a number of purposes such as:

- To protect your accounts from unauthorized access or identity theft;
- To process your requests such as securities purchases and sales;
- To establish or maintain an account with an unaffiliated third party, such as a clearing broker-dealer providing services to you and AASI;
- To service your accounts, such as by issuing checks and account statements;
- To comply with Federal, State, and Self-Regulatory Organization

### **Our Security Policy:**

We restrict access to non-public personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic and procedural security measures to safeguard confidential client information.

### **Closed or Inactive Accounts:**

If you decide to close your account(s) or become an inactive client, our Privacy Policy will continue to apply.

### **Complaint and Privacy Notification:**

Please direct complaints to: Client Complaints Compliance Officer, Athena Advisory Services, Inc. 705 Barclay Circle, Suite 125, Rochester Hills, MI 48307

### **Changes to This Privacy Policy:**

If we make any changes in the way we use or disseminate confidential information, we will notify you.