



AthenaInvest Advisors LLC

AthenaInvest, Inc.

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Privacy Policy Statement

Last Amended August 2016

1. Privacy Policy

When AthenaInvest Advisors LLC (“Athena”) establishes a client relationship with an individual client through an advisory contract, Athena becomes subject to Regulation S-P which requires Athena to adopt policies and procedures to protect the Nonpublic Personal Information” of clients and to disclose the policies and procedures for protecting that information.

The purpose of our privacy policies and procedures are to provide administrative, technical and physical safeguards which assist Athena Personnel in maintaining the confidentiality of Nonpublic Personal Information collected from our consumers and/or the clients of Intermediaries. All Nonpublic Personal Information, whether relating to Athena's current or former clients, is subject to our privacy policies and procedures. Any doubts about the confidentiality of client information must be resolved in favor of confidentiality.

2. Definitions

The term “Client(s)” for the purpose of this section includes natural persons who have a written advisory contract directly with Athena. Clients who are referred by Intermediaries are not subject to Athena’s privacy policy.

Nonpublic Personal Information includes nonpublic “personally identifiable financial information” plus any list, description or grouping of clients that is derived from nonpublic personally identifiable financial information. Such information may include personal financial and account information, information relating to services performed for or transactions entered into on behalf of clients, advice provided by Athena to clients, and data or analyses derived from such Nonpublic Personal Information.

3. Firms’ Policy

Athena’s policy prohibits any sharing of Nonpublic Personal Information concerning Athena’s clients with any non-affiliated third party unless the clients authorize such sharing in writing, or if such sharing is necessary to open the client’s account or to settle a transaction in the client’s account, such as paperwork required to open an account at a third-party custodian.

4. Privacy Policy Deliveries

Athena makes its Privacy Policy disclosure available in the internal website or share drive. Our Privacy Policy disclosure is also included in our Advisory Contract(s). Athena ensures that all clients (who establish a contractual client relationship with Athena) are provided with the written Privacy Policy disclosure by requiring them to sign our Advisory Contract before or at the time of entering into the contract. Pursuant to Regulation S-P, Athena also delivers our Privacy Policy disclosure to all such clients on an annual basis.

5. Protection of Client Information and Records

Athena has adopted procedures for the administrative, technical & physical safeguarding of client information, including the following:

- It is our policy to not share information with non-affiliated third parties, except to transact business on behalf of the client for the limited purpose of investment management, such as opening accounts for the client with a third-party custodian.
- Clients are provided our Privacy Policy disclosure at the time of entering into the contract.
- Computerized client information is accessed by password protection or other established controls within our (or broker-dealers or custodian's or Intermediaries') system to ensure only authorized persons gain access. For example, sales personnel may access information regarding accounts assigned to them but not the accounts assigned to others.
- Requests for client information from outside parties such as regulators, the IRS, and other government or civil agencies, are referred to the CCO for review and response.
- All agreements with broker-dealers, Intermediaries and other service providers include the third party's privacy policies.
- The integrity of the firm's internal computer systems, including privacy protection, is subject to regular review.
- All hard-copy client Nonpublic Personal Information is secured and stored in locked physical facilities including, but not limited to: lockable offices, file drawers and cabinets. All locks used to secure such information are secured daily upon the close of business.

If any of Athena Personnel becomes aware that client's Nonpublic Personal Information security has been breached, lost, or stolen by an unauthorized party, he or she must IMMEDIATELY (no later than 24 hours of the individual becoming aware of the theft or possible unauthorized access) notify the CCO.

Failure to comply with this policy may result in disciplinary action up to and including termination.

6. Responsibility

Our CCO is responsible for reviewing, maintaining and enforcing the firm's policies and procedures to ensure meeting compliance with applicable federal and state laws and regulations. Our CCO is also responsible for distributing the firm's policies and procedures to all Athena Personnel and conducting appropriate training to ensure their adherence to the firm's policies and procedures.