

**BluePhoenix Solutions Ltd.
and Subsidiary Companies
(the “Company”)
Privacy Policy**

It is the policy of the Company that its employees and contractors are held to the highest standards of privacy when conducting the affairs of the Company. In compliance with the US Privacy Laws, the Company’s management has instituted the following “Privacy Policy”:

BluePhoenix respects the privacy of individuals. In general, unless there is a specific reason to collect information about an individual, BluePhoenix personnel should avoid receiving any personally identifiable information. Personally identifiable information means any information relating to an identified individual. For example, if a BluePhoenix customer sends a test script in order to facilitate the reproduction of an error in a product, all personally identifiable information should be removed before it is sent to BluePhoenix. In some situations, it is difficult, if not impossible, to avoid contact with personally identifiable information and in other situations BluePhoenix will need to collect information about individuals, especially those people working for a BluePhoenix customer or potential customer. In these situations, it is imperative that all efforts are made to protect the personally identifiable information. Various regulations have been enacted in recent years prohibiting the use of personally identifiable information in any manner other than that specifically authorized by the individual. In the event that a BluePhoenix employee or contractor comes into contact with personally identifiable information about a customer’s clients, this information may not be collected, used or disclosed in any manner. In the case in which BluePhoenix collects personally identifiable information, generally about people working for or with customers or potential customers, this information may only be used to provide BluePhoenix services and products. Personally identifiable information should be stored in a manner to avoid accidental, unauthorized or unlawful access, disclosure, or loss. Personally identifiable information may not be disclosed or made available to any third party. Any known or suspected security breaches related to such personal information should be immediately reported to the employee or contractor’s supervisor and to the Human Resources Department.