

Data Retention Policy

Version 1.0 · Effective 8 July 2026 · Last updated 8 July 2026
Empirical (OPC) Private Limited · cloxy.co

This Data Retention Policy sets out how long **Empirical (OPC) Private Limited** ("Cloxy", "we", "us") keeps each category of personal data, why we keep it, and what happens when you delete your account. It is the detailed schedule behind the retention summary in the [Privacy Policy](#) and forms part of our [Terms of Service](#).

The periods below are our committed retention standards. We keep personal data no longer than these periods unless a legal hold applies (Section 6).

The short version

We keep your data while your account is active. When you delete your account, we anonymise your live profile immediately and permanently delete your photos and identity document files from storage. A limited archived snapshot is kept for up to 3 years for fraud prevention and legal claims, payment records are kept for 8 years because company and tax law require it, and everything else falls away on the schedule below.

1. Why we keep data at all

Deleting everything the moment you leave sounds simple, but it would make pay disputes impossible to resolve, let bad actors return unnoticed, and put us in breach of Indian company and tax law. So we follow three rules instead:

- **Purpose-bound** - every category in the schedule has a stated reason. When the reason ends, so does the data.
- **Time-bound** - retention periods are defined up front, not open-ended.
- **Minimal** - where we can serve the purpose with less, we anonymise or delete earlier.

2. The retention schedule

The table below covers every category of personal data we hold. "Deletion" means deletion of your account, whether you delete it in the app or we close it.

How long we keep each category of data, and why		
CATEGORY	HOW LONG	WHY
Active account and profile data	Life of the account	Needed to provide the service.
Deleted-account archived snapshot	Up to 3 years after deletion, then purged	Fraud prevention and the limitation period for legal claims.
Payment and payout records	8 years	Companies Act, 2013 and tax record-keeping requirements.
Attendance and clock records	Up to 24 months, or as long as needed to substantiate pay	Pay and attendance disputes.
Chat messages and images	Up to 6 months after account deletion	Dispute resolution.
Identity document files	Permanently deleted from storage when the account is deleted	No longer needed once the account is gone.
OTPs and session tokens	Transient (minutes to days)	Security only.
Website waitlist data	Up to 12 months	Launch communications.
Registration data after account withdrawal	180 days	IT Rules, 2021.
Analytics data	Per vendor retention policies	See the Privacy Policy .

Two clarifications. First, identity document **files** means the document images themselves - they are permanently deleted from storage when your account is deleted, while the record that a document was verified (its type, status, and dates) forms part of the archived snapshot. Second, "up to" periods are maximums - we may delete earlier where the data is clearly no longer needed.

3. What happens when you delete your account

Account deletion is available in the app settings and is confirmed with an OTP, so nobody else can delete your account for you. When you confirm, all of the following happen:

1. Your live profile is **anonymised immediately** - your name, contact details, and photo stop appearing anywhere on the platform.
2. Your pending shift applications are withdrawn.
- 3.

Your upcoming hired shifts are cancelled.

4. Your photos and identity document files are **permanently deleted from storage**.
5. A snapshot of your account records is archived and kept for the periods in Section 2, then purged.

Deletion is blocked in exactly one situation: while you are clocked in to a running shift. Once that shift is finished or resolved, you can delete straight away.

Your wider rights - access, correction, nomination, and consent withdrawal - are described in the [Privacy Policy](#).

4. Backups

We keep encrypted backups of our systems on a rolling window so we can recover from failures. When you delete data, it disappears from backups as they cycle out of that window. Backups are used for disaster recovery only - if we ever have to restore a system from backup, we re-apply your deletion.

5. Legal holds

If specific data is subject to an ongoing investigation, a dispute, a court or regulatory order, or another legal obligation, we keep that data - and only that data - until the matter concludes, even if its scheduled period expires first. Once the hold lifts, the normal schedule applies again.

6. Data held by our service providers

Some data is processed for us by service providers - payments, file storage, analytics, crash reporting, and SMS delivery - all listed in the [Privacy Policy](#). Our contracts limit them to processing on our instructions. Analytics data is retained under each vendor's own retention policy; cookies and website analytics specifically are covered in the [Cookie Policy](#).

7. Questions and requests

If you want to know what we hold about you, ask for earlier deletion of something specific, or question any period in this policy, contact our Grievance Officer:

GRIEVANCE OFFICER (IT RULES, 2021 AND DPDP ACT, 2023)

Empirical (OPC) Private Limited

cloxysupport@gmail.com

Monday to Saturday, 10:00 AM to 7:00 PM IST

We acknowledge grievances within **24 hours** and resolve them within **15 days**. Full contact details are on the

[Contact & Grievance Officer](#) page.

8. Changes to this policy

If we change a retention period or add a data category, we will update this policy, its version number, and the version history before the change takes effect. We will not quietly extend how long we keep data we have already collected - a change like that will be announced through the apps or the website first.