

BEFORE THE APPELLATE AUTHORITY
(Under the Right to Information Act, 2005)
SECURITIES AND EXCHANGE BOARD OF INDIA

Appeal No. 6616 of 2025

Suma : Appellant
Vs

CPIO, SEBI, Mumbai : Respondent

ORDER

1. The appellant had filed an application dated October 25, 2025 (received by the respondent through RTI MIS Portal) under the Right to Information Act, 2005 (“**RTI Act**”). The respondent, by a letter dated November 10, 2025, responded to the application filed by the appellant. The appellant filed an appeal (Reg. No. SEBIH/A/E/25/00293) dated November 14, 2025. I have carefully considered the application, the response and the appeal and find that the matter can be decided based on the material available on record.
2. **Queries in the application** - The appellant, in his application dated October 25, 2025, sought the following information regarding KYC process:

“ 1)Should the name of the person match the name in officially valid document OR should it match the name in PAN.

2)If the name should exactly match as per name in PAN, then why PAN is not accepted as a official valid document and other documents which accept initials are accepted as officially valid documents.

3)Please confirm what is the latest instructions given by SEBI and share the related circular number.

4)When latest Aadhar based E-PANs accept initials, why people are not allowed to update their old pans to have initials.

5)Can an individual complete the KYC process with initials not expanded as per PAN. If yes, please share the related SEBI circular

6) If the demat account and mutual funds should have the full name with initials expanded to match the name in PAN, please confirm if the name as per bank account should also have the initials expanded and match the name in PAN. Please share related circular.

7) If any exemptions and relaxation has been given in name match issue, please share the latest circular reference”

3. **Reply of the Respondent** –The respondent, in response to the application, informed that the queries are not clear and specific and are in the nature of seeking clarification / confirmation. Accordingly, the same cannot be construed as “Information”, as defined u/s 2(f) of the RTI Act. However, respondent also informed that the appellant can refer to SEBI Master Circular on KYC in Securities Market which *inter-alia*, guides on the subject matter. The respondent informed that the said Master Circular is available on SEBI website and provided the link for accessing the same.
4. **Ground of appeal** – The appellant has filed the appeal on the ground that he was provided incomplete, misleading or false information.
5. I have perused the application and the response provided thereto. On consideration, I concur with the response of the respondent that the queries are in the nature of seeking clarification/confirmation from the respondent. I find that the said queries cannot be construed as seeking ‘information’ as defined under section 2(f) of the RTI Act. Consequently, the respondent did not have an obligation to provide such clarification or opinion under the RTI Act. In this context, reliance is placed on matter of *Azad Singh vs. CPIO, Oriental Insurance Company Limited* (order dated March 23, 2021) wherein Hon’ble Central Information Commission(CIC) observed that “7. The Commission, after hearing the submissions of both the parties and after perusal of records, observed that some queries of the appellant are in the nature of seeking explanation/ opinion/ advice/ confirmation/ clarification from the CPIO and he has expected that the CPIO firstly should analyze the documents and then provide information to the appellant. But the CPIO is not supposed to create information; or to interpret information; or to compile information as per the desire of the appellant under the ambit of the RTI Act. As per Section 2(f) of the RTI Act, the reasons/ opinions/ advices can only be provided to the applicants if it is available on record of the public authority. The CPIO cannot create information in the manner as sought by the appellant. The CPIO is only a communicator of information based on the records held in the office and hence, he cannot be expected to do research work to deduce anything from the material therein and then supply it to him.” Accordingly, I do not find any deficiency in the response of the respondent.
6. Notwithstanding the above, I find that the respondent has provided appropriate guidance to the appellant in obtaining the requested information.

7. In view of the above observations, I find that there is no need to interfere with the decision of the respondent. The appeal is accordingly dismissed.

Place: Mumbai

Date: December 10, 2025

**RUCHI CHOJER
APPELLATE AUTHORITY UNDER THE RTI ACT
SECURITIES AND EXCHANGE BOARD OF INDIA**