

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

Appeal No. 6691 of 2026

Sunil Singh : Appellant

Vs

CPIO, SEBI, Mumbai : Respondent

ORDER

1. The appellant had filed an application dated December 22, 2025 (received by the respondent through RTI MIS Portal) under the Right to Information Act, 2005 ("**RTI Act**"). The respondent, by a letter dated January 07, 2026, responded to the application filed by the appellant. The appellant filed an appeal (Reg. No. SEBIH/A/E/26/00014) dated January 10, 2026. 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. **Query in the application** - The appellant, in his application dated December 22, 2025, sought the following information with respect to his complaint dated September 05, 2025 filed on SCORES portal:

"1 Complaint Status & Action Taken

Certified copy of all internal file notes, notings, comments, directions, and approvals recorded by SEBI officials in relation to my SCORES complaint.

Certified copy of action taken report/ direction issued by SEBI to HUL/ Kfin Technologies in response to my complaint.

Current status of the complaint as per SEBI records.

2 Investigation & Legal Stop

Any document, email, instruction, report, or correspondence received from HUL/ Kfin Tech regarding investigation/ legal stop on folio HLL302XXX.

If SEBI has permitted a legal stop on the folio, provide regulatory basis/ circular/ approval copy.



Whether SEBI has verified the existence of the alleged legal stop. If yes, provide verification report or file note.

3 Regulatory Compliance

Whether SEBI has examined the violation of SEBI circular:

SEBI/HO/MIRSD/MIRSD_RTAMB/P/CIR/2022/8 dated 25 January 2022

SEBI/HO/MIRSD/MIRSD_RTAMB/P/CIR/2021/655 dated 03 November 2021

Provide action taken details.

4 Communication Records

Certified copies of all correspondence exchanged between SEBI and:

Kfin Technologies

Hindustan Unilever Ltd.

Any third party

relating to my complaint.

5 Delay Reasoning

Reasons recorded by SEBI for not resolving the matter within mandated timeline.

Name and designation of SEBI officer(s) handling the matter.

FORM OF DISCLOSURE REQUIRED

Kindly provide:

soft copies via email, OR

scanned PDFs uploaded to RTI portal"

3. **Reply of the Respondent** –The respondent, in response to query nos. 1, 2 and 4 in the application, informed that the complaint handling process on SCORES is electronic and the ATR contains all information related to processing of the complaint. No separate file notings are maintained outside the system. All actions, observations, clarification sought and responses received are recorded as part of the action history on SCORES, which is accessible after logging in with the credentials. The respondent also



informed that as the disposal of complaint is through online mode only, the certified copies are not provided by SEBI.

The respondent, in response to query nos. 3 and 5, informed that the queries are in the nature of seeking clarification/opinion/reasons. Accordingly, the same cannot be construed as "information", as defined u/s 2(f) of the RTI Act.

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. With regard to query nos. 1, 2 and 4, I note that the respondent has informed that all the action taken, observations, clarification sought and responses received with respect to his complaint can be accessed by the appellant by logging into SCORES portal. Accordingly, I find that the respondent has adequately addressed the queries.
6. With regard to the query nos. 3 and 5, I concur with the response of the respondent that the same are in the nature of seeking clarification/opinion/reason from the respondent. I find that the said query 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.
7. Additionally, with regard to the name of SEBI officer sought by the appellant, I find that the same is in the nature of the personal information, the disclosure of which may also endanger the life or physical safety to the person. I note that a similar issue was settled in the matter of *H. E. Rajashekarappa vs. State Public Information Officer and Ors.* (Order dated July 01, 2008), wherein the Hon'ble High Court of Karnataka had



ruled that: "... it cannot be said that section 2(f) of the Act (the RTI Act encompasses the personal information of the officials of the public authority. The intention of the legislation is to provide right to information to a citizen pertaining to public affairs of the public authority". Further, I note that the Hon'ble Central Information Commission (hereinafter referred to as "CIC"), in the matter of *Prerit Misra vs. CPIO, SEBI* (order dated November 21, 2022) held that- "It is pertinent to mention here that the appellant in a similar case which was dealt in File no. CIC/SEBIE/A/2019/660770 dated 10.08.2021 whereby he had sought information regarding the names of the officers who had blocked his email address, the Commission, while passing an order had held that such information is exempted u/s 8(1)(g) & 8(1)(j) of the RTI Act. The Commission after considering the submissions of the appellant finds no merit in his case, and also is in agreement with the order of the FAA and concludes that the information is exempt u/s 8(1)(g) & 8(1)(j) of the RTI Act, hence, no relief can be given." In view of these observations, I find that the same is exempt from disclosure under sections 8(1)(g) and 8(1)(j) of the RTI Act.

8. 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: February 02, 2026



RUCHI CHOJER

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