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

Appeal No. 7018 of 2026

R K Singhal	:	Appellant
	Vs	
CPIO, SEBI, Mumbai	:	Respondent

ORDER

1. The appellant had filed an application (transferred to SEBI from Reserve Bank of India on July 28, 2026) under the Right to Information Act, 2005 ("**RTI Act**"). The respondent, by a letter dated August 05, 2026, responded to the application filed by the appellant. The appellant filed an appeal dated August 05, 2026 (Reg. No. SEBIH/A/E/26/00292). I have perused the application, the response of the respondent 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, sought the following information:

"I HAVE 10 SHARES OF INDUSTRIAL CREDIT AND INVESTMENT CORPORATION OF INDIA LIMITED IN PHYSICAL FORM. BEARING SHARE HOLDERS FOLIO NUMBER R064xxx

1. *I WISH TO KNOW THE STATUS OF PRESENT SHARE PLEASE PROVIDE COPY OF RELIVENT SHAREHOLDERS PAGE IN WHICH MY NAME SHOWN.*
2. *PLS PROVIDE COPY OF DACUMENTS I HAVE TO SUBMITT FOR DOING KYC FOR TAKING SHARES OF THE ICICI BANK .*
3. *COPY OF THE DOCUMENTS SUBMITTED TO RBI BY ICICI WHICH SHOWS NAME AND ADDRESS AND EMAIL ID OF ALL THE DIRECTORS OF ICICI BANK AND ITS COMPANY SECRETARY. IF THE DESIRED INFORMATION IS NOT IN YOUR OFFICE MY PL TRANSGENDER MY APPLICATION TO RELIVENT OFFICE UNDER PROVISIONS OF RTI ACT."*

3. **Reply of the Respondent** – The respondent, in response to query no. 1, in the application, informed that the information sought is not maintained by SEBI in normal course of regulation of securities market. Hence the same is not available with SEBI.

   With regard to query no. 2, the respondent informed that the information sought is in the nature of seeking clarification/opinion. Accordingly, the same cannot be construed as "information", as defined u/s 2(f) of the RTI Act.

   Further, respondent informed that for matters pertaining to KYC, appellant can refer to the Master Circular on KYC dated October 12, 2023 and other Circulars issued by SEBI from time to time. The respondent stated that the same is available in the public domain and can be accessed through the SEBI website.

   With regard to query no. 3, the respondent informed that the information sought does not pertain to SEBI.

4. **Ground of appeal** – On perusal of the appeal, it appears that the appellant is not satisfied with the response of the respondent.

5. I have perused the application and the response provided thereto. With regard to query nos. 1 and 3, I note that the requested information is not available with SEBI. I note that the respondent can only provide information that is available in the records. In this context, I note that the Hon'ble Supreme Court of India in *Central Board of Secondary Education & Anr. vs. Aditya Bandopadhyay & Ors* (Judgment dated August 9, 2011) held that *"The RTI Act provides access to all information that is available and existing. This is clear from a combined reading of section 3 and the definitions of `information' and `right to information' under clauses (f) and (j) of section 2 of the Act. If a public authority has any information in the form of data or analysed data, or abstracts, or statistics, an applicant may access such information, subject to the exemptions in section 8 of the Act. But where the information sought is not a part of the record of a public authority, and where such information is not required to be maintained under any law or the rules or regulations of the public authority, the Act does not cast an obligation upon the public authority, to collect or collate such non-available information and then furnish it to an applicant.*" Further, I note that the Hon'ble Central Information Commission (hereinafter referred to as "**CIC**") in the matter of *Sh. Pattipati Rama Murthy vs. CPIO, SEBI* (Decision dated July 8, 2013), held: *"… if it (SEBI) does not have any such information in its possession, the CPIO cannot obviously invent one for the benefit of the Appellant. There is simply no information to be given."* Accordingly, I do not find any deficiency in the response of the respondent.

6. With regard to query no.2, the respondent has informed that the information sought is in the nature of seeking clarification/opinion. 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 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. 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: September 02, 2026

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