ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
Swiss Life AG, Swiss Life Intellectual Property Management AG v. Hao Wu
Case No. D2026-4760

1. The Parties

The Complainants are Swiss Life AG, Switzerland, and Swiss Life Intellectual Property Management AG, Switzerland, represented by FMP Fuhrer Marbach & Partners, Switzerland.

The Respondent is Hao Wu, China, self-represented.

2. The Domain Name and Registrar

The disputed domain name <swiss.life> is registered with NameCheap, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on October 20, 2026. On October 20, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 22, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain name which differed from the named Respondent (unknown / The RDAP server redacted the value) and contact information in the Complaint. The Center sent an email communication to the Complainants on October 22, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainants to submit an amendment to the Complaint. The Complainants filed an amendment to the Complaint on October 22, 2026.

The Center verified that the Complaint together with the amendment to the Complaint satisfied the formal requirements of the Uniform Domain Name Dispute Resolution Policy (the "Policy" or "UDRP"), the Rules for Uniform Domain Name Dispute Resolution Policy (the "Rules"), and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the "Supplemental Rules").

In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent of the Complaint, and the proceedings commenced on October 23, 2026. In accordance with the Rules, paragraph 5, the due date for Response was November 12, 2026. The Response was filed with the Center on October 24, 2026.

The Center appointed Warwick A. Rothnie as the sole panelist in this matter on October 29, 2026. The Panel finds that it was properly constituted. The Panel has submitted the Statement of Acceptance and Declaration of Impartiality and Independence, as required by the Center to ensure compliance with the Rules, paragraph 7.

4. Factual Background

The Complainant Swiss Life AG is a life insurance, pensions and financial services provider. It was originally incorporated in Switzerland in 1857 and changed its name to its current name in 2002. In 2019, the Complainant Swiss Life AG's group had CHF 254 billion in assets under management. The total turnover was more than CHF 23 billion. It, or its group, had around 9,300 employees and 14,000 consultants serving more than 4 million customers. It is the largest life insurance company in Switzerland. It is among the 15 largest insurance companies in Europe according to assets and the fourth largest by market value. In 2019, Forbes ranked it as 125 on its list of World's Best Regarded Companies.

In addition to being part of its name, SWISS LIFE is also the Complainants', and the group's, umbrella brand. Consistently with that, it has a website "www.swisslife.com" and also has numerous other domain names in country-specific or other targeted domain names such as <swisslife.ch>, <swisslife.de>, <swisslife.be>, <swisslife.at>, <swisslife.li>, <swisslife.lu>, <swisslife.sk>, <swisslife.swiss>, <swisslife.fr>, <swisslife.sg>, <swisslife.hk>, <swisslife.com>, <swisslife.insurances> and <swisslife.shop>. A number of these redirect to "www.swisslife.com". Some appear to forbid access. According to WhoIs reports, <swisslife.com> and <swisslife.ch> were first registered in 1996.

Brand Finance ranked the Complainants' trademark in 2025 as the 10th most valuable brand in Switzerland with a brand value of USD 4.865 billion and a brand rating of "AA-" . The Swiss Supreme Court ruled in 2007 that SWISS LIFE is a well-known trademark for the purposes of Swiss law.

The Complaint includes evidence that the Complainant Swiss Life Intellectual Property Management AG owns numerous registered trademarks for, or including, SWISS LIFE. These include:

(a) one of the oldest is Spanish Registered Trademark No M1622040(4), SWISS LIFE, which has been registered since March 6, 1991 in respect of relevant services in International Class 36;

(b) Swiss Registered Trademark No 491528, SWISS LIFE, which has been registered since November 15, 2001 in respect of a range of goods and services in International Classes 9, 16, 35, 36, 38, 41, and 42;

(c) European Union Trade Mark No 003438413, SWISS LIFE, which has been registered since October 20, 2006 in respect of a range of goods and services in International Classes 9, 16, 35, 36, 38, 41, 42, and 44; and

(d) Chinese Registered Trademark No G829188, which has been registered since April 30, 2004 in respect of services in International Classes 35 and 36 for:



According to the WhoIs report, the disputed domain name was registered on July 2, 2015. In the Response, however, the Respondent states that the Respondent acquired the disputed domain name at auction on August 9, 2026.

According to the Response, the Respondent made the acquisition as an investment based on the strong geographic keyword "swiss" and the broadly usable ".life" generic Top-Level Domain ("gTLD") extension.

The disputed domain name does not resolve to an active website but instead resolves to a GoDaddy parking page where the disputed domain name is offered for sale. There are no pay-per-click advertising links on the extract of the landing page submitted with the Complaint. According to the Response, the Respondent offers the disputed domain name for sale to the general market for USD 2,660.

5. Discussion and Findings

Paragraph 4(a) of the Policy provides that in order to divest the Respondent of a disputed domain name, the Complainants must demonstrate each of the following:

(i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainants have rights;

(ii) the Respondent has no rights or legitimate interests in respect of the disputed domain name; and

(iii) the disputed domain name has been registered and is being used in bad faith.

Paragraph 15(a) of the Rules directs the Panel to decide the Complaint on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable.

A. Identical or Confusingly Similar

The first element that the Complainants must establish is that the disputed domain name is identical with, or confusingly similar to, the Complainants' trademark rights.

It is well accepted that the first element functions primarily as a standing requirement. The standing (or threshold) test for confusing similarity involves a reasoned but relatively straightforward comparison between the Complainants' trademark and the disputed domain name. WIPO Overview of WIPO Panel Views on Select UDRP Questions ("WIPO Overview 3.1"), section 1.7.

The Complainants have proven ownership of registered trademarks for SWISS LIFE and SWISS LIFE (figurative).

The comparison of the disputed domain name to the Complainants' trademark simply requires a visual and aural comparison of the disputed domain name to the proven trademarks. This test is narrower than and thus different to the question of "likelihood of confusion" under trademark law. Therefore, questions such as the scope of the trademark rights, the geographical location of the respective parties, the date they were acquired and other considerations that may be relevant to an assessment of infringement under trademark law are not relevant at this stage. Such matters, if relevant, may fall for consideration under the other elements of the Policy. See e.g., WIPO Overview 3.1, section 1.7.

Typically, in undertaking that comparison, the Top-Level Domain ("TLD") component is disregarded as a functional aspect of the domain name system. WIPO Overview 3.1, section 1.11.1. In cases where the TLD and the second-level portion of the disputed domain name contain the relevant trademark, however, it is permissible and, in this case, appropriate to consider the disputed domain name as a whole. WIPO Overview 3.1, section 1.11.3. On that basis, the Panel finds that the disputed domain name is identical to the Complainants' SWISS LIFE trademark.

Having reached that conclusion, it is not strictly necessary to consider the SWISS LIFE (figurative) mark. The Panel notes that it would also be usual to disregard the design elements of that trademark (see WIPO Overview 3.1, section 1.10). On that basis, the disputed domain name would also be identical to that trademark.

Accordingly, the Panel finds that the Complainants have established that the disputed domain name is identical to the Complainants' trademark and the requirement under the first limb of the Policy is satisfied.

B. Rights or Legitimate Interests

The second requirement the Complainants must prove is that the Respondent has no rights or legitimate interests in the disputed domain name.

Paragraph 4(c) of the Policy provides that the following circumstances can be situations in which the Respondent has rights or legitimate interests in a disputed domain name:

(i) before any notice to [the Respondent] of the dispute, [the Respondent's] use of, or demonstrable preparations to use, the [disputed] domain name or a name corresponding to the [disputed] domain name in connection with a bona fide offering of goods or services; or

(ii) [the Respondent] (as an individual, business, or other organization) has been commonly known by the [disputed] domain name, even if [the Respondent] has acquired no trademark or service mark rights; or

(iii) [the Respondent] is making a legitimate noncommercial or fair use of the [disputed] domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

These are illustrative only and are not an exhaustive listing of the situations in which a respondent can show rights or legitimate interests in a domain name.

While the overall burden of proof in UDRP proceedings is on the complainant, panels have recognized that proving a respondent lacks rights or legitimate interests in a domain name may result in the often impossible task of "proving a negative", requiring information that is often primarily within the knowledge or control of the respondent. As such, where a complainant makes out a prima facie case that the respondent lacks rights or legitimate interests, the burden of production on this element shifts to the respondent to come forward with relevant evidence demonstrating rights or legitimate interests in the domain name. If the respondent fails to come forward with such relevant evidence, the complainant is deemed to have satisfied the second element. WIPO Overview 3.1, section 2.1.

There is no dispute between the Parties that:

(1) The Respondent registered the disputed domain name after the Complainants began using the trademark and also after the Complainants had registered their trademark;

(2) The Respondent is not affiliated with the Complainants;

(3) The Complainants have not otherwise authorised the Respondent to register or use the disputed domain name;

(4) The disputed domain name is not derived from the Respondent's name. Nor is there any suggestion of some other name by which the Respondent is commonly known from which the disputed domain name could be derived.

These factors are usually sufficient to establish a prima facie case that the Respondent does not have rights or legitimate interests in a disputed domain name.

In the present case, the Respondent says that he is a domain investor and has pursued two overlapping investment strategies. The first strategy is investing in strong generic keywords. This is combined with the second strategy: investing in popular new TLDs with country-related or geographic prefixes.

In that connection, the Respondent points out that "swiss" is a dictionary word with an independent geographic meaning. For example, there are Swiss International Air Lines which apparently trades as "Swiss", "www.swissinfo.ch" which is the website of the Swiss Broadcasting Corporation and the Swiss Army knife. The Respondent also presents evidence that DotDB reports 350 exact-match "Swiss domains" of which 252 are classified as "Active". Within the ".life" TLD, there are also domain names <myswiss.life> which resolves to a website that markets wellness products and <swissweb.life> which resolves to a website that provides website development services to small and medium-sized businesses. The Respondent says the name was chosen because "Swiss" as a geographical reference has a wide range of applications including travel, residence, culture, commerce, and many other activities.

Next, the Respondent points to evidence that the ".life" TLD ranks 23rd in terms of popularity among the 1,113 delegated new TLDs based on number of registrations within the new TLD. The Respondent generated a report showing 2,361 possible candidates of which 417 returned "IP-address answers" – one of these was the disputed domain name; 96 of these registrations had identifiable purposes and 184 were classified as parking, sales or related landing routes. Examples combining the country or geographic connotation in the ".life" TLD include the domain names <eesti.life> which resolves to a website providing a settlement and everyday life guide to Estonia, <manx.life>, resolving to a website providing information and directory services for the Isle of Man, and <polski.life> with the associated website which provides Polish-language courses.

The Response also includes evidence that the Respondent has been following this investment strategy from well before registering the disputed domain name. The earliest domain name evidenced is <dutch.im> registered in June 2025. Other country-specific registrations include <german.im>, <canadian.im> and <american.im>. The Respondent acquired the domain name <boat.life> in March 2026 and resold it two months later, presumably at a profit as the Respondent says this success strengthened his decision to continue the investment strategy. The Respondent also registered <marine.life> a few days before registering the disputed domain name.

Against this background, the Respondent points out, and the Panel accepts, that buying for resale descriptive or generic domain names can be a good faith offering of goods or services under the Policy, citing *Allocation Network GmbH v. Steve Gregory*, WIPO Case No. D2000-0016 and *Alba Edible Oils Pty Ltd v. Domain Admin, FindYourDomain.com,* WIPO Case No. D2025-1961 ("*Alba Edible Oils*"). The panelist in *Alba Edible Oils* explained that the practice was "most likely to be deemed legitimate under the Policy" when:

- the respondent regularly engages in the business of registering and reselling domain names, and/or using them to display advertising links;

- the respondent makes good-faith efforts to avoid registering and using domain names that are identical or confusingly similar to marks held by others;

- the domain name in question is a "dictionary word" or a generic or descriptive phrase;

- the domain name is not identical or confusingly similar to a famous or distinctive trademark; and

- there is no evidence that the respondent had actual knowledge of the complainant's mark.

In this case, the evidence relating to the first and third matters supports the Respondent's case. The Respondent also specifically denies knowledge of the Complainants or their trademark.

The Respondent's position falls down, however, on the second and fourth criteria. There is no evidence that the Respondent made good faith efforts to avoid registering a domain name identical or confusingly similar to someone else's trademark.

In addition, the Panel considers that the Complainants' trademark qualifies at least as a well-known or famous trademark. The Respondent points out that there is very limited, if any, evidence that the

Complainants have developed a significant reputation in China. However, of course, a domain name is used on the Internet and so has near-instant and global reach.

The reputation in the Complainants' trademark is a significant distinguishing feature from many of the other domain names which the Respondent invokes. It is also an important distinguishing factor from the *Alba Edible Oils* case where the panel referred to the respondent's submission that the complainant in that case had modest advertising expenditure and the product was a niche edible-oil brand which did not enjoy broad consumer recognition. That is not this case.

Accordingly, the Panel finds that the Respondent has not rebutted the Complainants' prima facie case and therefore the Complainants have established the second requirement under the Policy.

C. Registered and Used in Bad Faith

Under the third requirement of the Policy, the Complainants must establish that the disputed domain name has been both registered and used in bad faith by the Respondent. These are conjunctive requirements; both must be satisfied for a successful complaint: see e.g. *Group One Holdings Pte Ltd v. Steven Hafto*, WIPO Case No. D2017-0183.

The Complainants rely on the strength of their reputation and the offering of the disputed domain name for sale to satisfy this requirement under the Policy.

Generally speaking, a finding that a domain name has been registered and is being used in bad faith requires an inference to be drawn that the respondent in question has registered and is using the disputed domain name to take advantage of its significance as a trademark owned by (usually) the complainant.

As already noted, the Respondent specifically denies knowledge of the Complainants' trademark when registering the disputed domain name in line with his investment strategy. The comparatively low price at which the disputed domain name is being offered for sale lends some support to that claim.

Numerous decisions under the Policy, however, have recognised that a respondent who engages in a business of purchasing domain names has an affirmative obligation to avoid registering a trademark-abusive domain name. WIPO Overview 3.1, section 3.2.3.

There is no evidence that the Respondent took even the most rudimentary of steps when registering the disputed domain name. For example, a simple search (including on Baidu) returns a first page in which all the listings are of the Complainants or their group. In light of this failure and the direct conflict with the Complainants' well-known trademark, the Panel finds that the disputed domain name has been registered and through its offer for sale is being used in bad faith.

Accordingly, the Complainants have established all three requirements under the Policy.

6. Decision

For the foregoing reasons, in accordance with paragraphs 4(i) of the Policy and 15 of the Rules, the Panel orders that the disputed domain name <swiss.life> be transferred to the Complainants.

/Warwick A. Rothnie/
Warwick A. Rothnie
Sole Panelist
Date: November 20, 2026