

ADMINISTRATIVE PANEL DECISION

Sanofi v. komal pawar
Case No. D2025-0820

1. The Parties

The Complainant is Sanofi, France, represented by Maître Philippe Martini-Berthon, Selarl Marchais & Associates, France.

The Respondent is komal pawar, India.

2. The Domain Name and Registrar

The Disputed Domain Name <careers-sanofi.com> is registered with Dynadot, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on February 27, 2025. On February 27, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On February 28, 2025, 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 (redacted for privacy) and contact information in the Complaint. The Center sent an email communication to the Complainant on February 28, 2025, providing the Registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint. The Complainant filed an amended Complaint on March 7, 2025.

The Center verified that 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 March 13, 2025. In accordance with the Rules, paragraph 5, the due date for Response was April 2, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on April 3, 2025.

The Center appointed Michal Havlík as the sole panelist in this matter on April 9, 2025. 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 is a French multinational pharmaceutical company headquartered in Paris which engages in research and development, manufacturing and marketing of pharmaceutical products for sale, principally in the prescription market, but the firm also develops over-the-counter medication and was founded in 2004. In addition to that, the Complainant is a member of the European Federation of Pharmaceutical Industries and Associations (EFPIA). Furthermore, the Complainant offers a wide range of patented prescription drugs to treat patients with serious diseases, namely cardiovascular, thrombosis, metabolic disorders, oncology, central nervous system, internal medicine and vaccines.

The Complainant owns multiple trademark registrations including:

- French trademark SANOFI no. 96655339 registered on January 17, 1997;
- European trademark SANOFI no. 010167351 registered on January 7, 2012;
- International Registration no. 1092811 registered on August 11, 2011, valid, inter alia, in Australia, Japan, Republic of Korea, Russian Federation, and Ukraine; and

(the “Sanofi trademark”).

The Complainant is also the owner of multiple domain names used in its business websites including:

- <sanofi.com> registered on October 13, 1995; and
- <sanofi.eu> registered on March 12, 2006; and
- <sanofi.fr> registered on October 10, 2006.

Concerning the Disputed Domain Name, it was registered through Dynadot, LLC, on February 12, 2025. Having checked the Disputed Domain Name, the Panel notes that there was no change on the websites after filing of the Complaint meaning that there is a parked website placed on the Disputed Domain Name with affiliated links on the pay-per-click basis with certain links connected to the Complainant, such as “Sanofi Recrutement” and “Pharma en Ligne”.

5. Parties’ Contentions

A. Complainant

The Complainant contends that it has satisfied each of the elements required under the Policy for a cancellation of the Disputed Domain Name.

The Complainant cites its national as well as European and international trademark registrations for word mark SANOFI. Consequently, the Complainant satisfies the requirement of holding a right in the term “Sanofi”. Furthermore, the Complainant underlines that the dates of registration of all the above-mentioned trademarks and domain names are prior to the registration of the Disputed Domain Name. Therefore, the Respondent knew or should have been aware of their existence.

Not only that but the Disputed Domain Name also reproduces Sanofi trademarks in its entirety which are of a high distinctiveness since they are fanciful. The Disputed Domain Name contains the Sanofi trademark as its dominant part regardless of the adjunction of the descriptive term “careers” suggesting a particular focus on human resources activities and the generic Top-Level-Domain (“gTLD”) .com which does not serve to distinguish the Disputed Domain Name from Sanofi trademark.

Finally, the Complainant contends that the Disputed Domain Name is confusingly similar to the Complainant's trademarks on which it has rights since it completely includes the Sanofi trademarks despite the addition of the term "careers". The Complainant also alleges that previous Panels have considered Sanofi trademarks to be well-known in many jurisdictions, see *Sanofi v. Contact Privacy Inc. Customer 1246827457*, *Contact Privacy Inc. Customer 1246827457 / Gopal Yadav, Onineaudiotraining*, WIPO Case No. [D2020-0832](#). The Complaint submits that the registration of the Disputed Domain Name signaled lack of legitimate interest since it has been registered only for the purpose of unfairly attracting Complainant's consumers (e.g., free-riding on the Complainant's broadly known reputation) and is leading to a parking website. Moreover, given the long-term and broad use of the Complainant's trademarks, the Respondent must have known about their existence when registering the Disputed Domain Name which shows the existence of bad faith as well according to the Complainant.

B. Respondent

The Respondent did not reply to the Complainant's contentions.

6. Discussion and Findings

Under paragraph 4(a) of the Policy, the Complainant has the burden of proving the following:

- (i) that the Disputed Domain Name is identical or confusingly similar to a trademark or a service mark in which the Complainant has right; and
- (ii) that the Respondent has no rights or legitimate interests in respect of the Disputed Domain Name; and
- (iii) that the Disputed Domain Name has been registered and is being used in bad faith.

A. Identical or Confusingly Similar

The Complainant has shown rights regarding a trademark or service mark for the purpose of the Policy. [WIPO Overview 3.0](#) section 1.2.1.

The entirety of the mark is reproduced within the Disputed Domain Name. Accordingly, the Disputed Domain Name is confusingly similar to the trademark for the purpose of the Policy. [WIPO Overview 3.0](#), section 1.8.

Although the addition of the other word element "careers", may bear on assessment of the second and third elements, the Panel finds the addition of such term does not prevent a finding of confusing similarity between the Disputed Domain Name and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

The Complainant has demonstrated existence of its trademark rights in France and in numerous other jurisdictions. The requirements of the first element for the purposes of the Policy may be satisfied by a trademark registered in any country. See *Thaigem Global Marketing Limited v. Sanchai Aree*, WIPO Case No. [D2002-0358](#). In addition to this fact, the Disputed Domain Name incorporates the entirety of the Complainant's trademarks. Apart from that, the Disputed Domain Name is composed of the gTLD .com which is an obligatory part of the domain name and is to be disregarded in assessment of confusing similarity, see *Autodesk v. MumbaiDomains*, WIPO Case No. [D2012-0286](#).

Accordingly, this Panel finds that the Disputed Domain Name is confusingly similar to a trademark in which the Complainant has rights.

The Panel finds the first element of the Policy has been established.

B. Rights or Legitimate Interests

Paragraph 4(c) of the Policy provides a list of circumstances in which the Respondent may demonstrate rights or legitimate interests in a Disputed Domain Name.

Although the overall burden of proof in UDRP proceedings is on the Complainant, previous panels have recognized that proving a respondent lack of rights or legitimate interests in a domain name may result in the difficult 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 right 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 (even though the burden of proof always remains on the Complainant). If the Respondent fails to come forward with such relevant evidence, the Complainant is deemed to have satisfied the second element. [WIPO Overview 3.0](#), section 2.1.

The Complainant contends that the Respondent has no prior right or legitimate interest to justify the use of its trademarks or domain names. The Complainant has never authorized the Respondent to do so.

Having reviewed the available record, the Panel finds the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the Disputed Domain Name. The Respondent has not rebutted the Complainant’s prima facie showing and has not come forward with any relevant evidence illustrating rights or legitimate interests in the Disputed Domain Name such as those enumerated in the Policy or otherwise.

The Respondent has used the Disputed Domain Name in connection with parked webpage with pay-per-click links connected to the Complainant. Previous panels have constantly found that the use of a domain name to host a parked page comprising pay-per-click links does not represent a bona fide offering where such links compete with or capitalize on the reputation and goodwill of the complainant’s marks or otherwise mislead Internet users. See section 2.9 of the [WIPO Overview 3.0](#).

The Panel finds the second element of the Policy has been established.

C. Registered and Used in Bad Faith

The Panel notes that, for the purpose of paragraph 4(a)(iii), paragraph 4(b) of the Policy establishes circumstances, in particular, but without limitation, if found by the Panel to be present, shall be evidence of the registration and use of a domain name in bad faith.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent’s registration and use of a domain name is in bad faith. [WIPO Overview 3.0](#), section 3.2.1.

The Complainant is not aware of any authorization given to the Respondent in terms of using Sanofi trademark or domain names. Furthermore, previous panels have recognized opportunistic bad faith in cases in which the contested domain name appears confusingly similar to a complainant’s well-known trademarks, see *Sanofi v. Whois Agent, Whois Privacy Protection Service, Inc. / Jim Moretta*, WIPO Case No. [D2016-0096](#).

According to the Complainant, the Respondent shows its bad faith by registering the Disputed Domain Name because it should have known about the Sanofi trademarks given their worldwide fame and distinctiveness. The Disputed Domain Name has been registered for the purpose of attracting Internet users to the Respondent’s website by creating a likelihood of confusion between Sanofi trademarks and the Disputed Domain Name.

Besides of registration in bad faith, the Complainant submits the disputed domain name is used in bad faith as well with regard to the fact that the Disputed Domain Name leads to a parking website created solely with the aim to divert Internet users from the Complainant's website and make a false impression of a connection existing between the Parties. Thus, the Respondent is trying to take advantage of Complainant's reputation since the links on the parking website are on the pay-per-click basis.

The Panel notes that the Complainant's trademarks predate the registration of the Disputed Domain Name by many years and have been intensively used in numerous jurisdictions. As a result of the long-term use, the Complainant's trademarks are distinctive and well-known in the field of pharmaceutical industry. Therefore, the Respondent knew or should have known about the Complainant's trademarks prior to registering the Disputed Domain Name, see *F. Hoffmann-La Roche AG v. Popo*, WIPO Case No. [D2008-0423](#).

When taking into account all relevant facts and circumstances, the Panel notes that the Disputed Domain Name is confusingly similar to the Complainant's distinctive and widely known trademark, the Respondent has no legitimate rights or interests in the Disputed Domain Name and has failed to submit any evidence of actual or contemplated good-faith use and such use is implausible, noting the nature of the domain name. The Panel finds that the Respondent has registered and used the Disputed Domain Name in bad faith primarily for the purpose of diverting Internet users to its websites by creating a false impression of connection existing between the Parties in order to gain illegitimate profit through the pay-per-click system on the parking website.

The Panel finds that the Complainant has established the third element of the Policy.

7. 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 <careers-sanofi.com> be cancelled.

/Michal Havlík/

Michal Havlík

Sole Panelist

Date: April 23, 2025