

## ADMINISTRATIVE PANEL DECISION

HDI Global SE, and HDI Versicherung AG v. Hoang Ngo  
Case No. D2025-2619

### 1. The Parties

The Complainants are HDI Global SE (the “First Complainant”), and HDI Versicherung AG (the “Second Complainant”), Germany, represented by Deloitte Legal, Germany.

The Respondent is Hoang Ngo, Viet Nam.

### 2. The Domain Name and Registrar

The disputed domain name <hdi-online.com> is registered with Spaceship, Inc. (the “Registrar”).

### 3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 3, 2025. On July 4, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 4, 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 (Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 7, 2025, 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 July 11, 2025.

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 July 15, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 4, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on August 5, 2025.

The Center appointed Assen Alexiev as the sole panelist in this matter on August 8, 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 Complainants belong to the Talanx Group, a European insurance group. The First Complainant is an industrial insurer for corporations, large companies and medium-sized businesses worldwide. It offers services in over 175 countries. In 2024, the gross insurance revenue of the First Complainant amounted to EUR 10 billion. The Second Complainant is one of the largest insurance companies in Germany, and offers a wide range of insurance and financial services for private and business customers. Both Complainants operate worldwide under the brand HDI.

The Complainants are joint owners of a number of trademark registrations for HDI (the “HDI trademark”), including the following representative registrations:

- the European Union trademark  with registration No. 000897710, registered on December 16, 1999, for goods and services in International Classes 16 and 36; and
- the International trademark  with registration No. 1475873, registered on May 2, 2019, for goods and services in International Classes 16 and 36.

The Complainants own numerous domain name registrations incorporating the HDI trademark, including <hdi.de>, <hdi.at>, <hdi.com.br>, <hdi.cl>, <hdi-bancassurance.de>, <hdi.com.mx>, <hdiassicurazioni.it>, <hdi.global> and <hdi-pensionsfonds.de>. The First Complainant operates its official website at the domain name <hdi.global> and the Second Complainant operates its official website at the domain name <hdi.de>.

The disputed domain name was registered on April 12, 2025. It redirects to a Vietnamese language website which offers various casino, betting and lottery games under the name “23Win”. The website states that it is “the official and only dealer site of 23Win bookmaker in Vietnam”, and also displays banners that redirect visitors to other Vietnamese language online games websites. The website also included sexualized advertising.

#### **5. Parties’ Contentions**

##### **A. Complainant**

The Complainants submit that the disputed domain name is confusingly similar to their HDI trademark, because it includes the trademark in its entirety, followed by the dictionary word “online”, which does not prevent a finding of confusing similarity with the trademark.

According to the Complainants, the Respondent has no rights or legitimate interests in respect of the disputed domain name. They point out that the Respondent registered the disputed domain name decades after the Complainants first registered the HDI trademark, and maintain that it must have been aware of this trademark at that time. The Complainants state that they have never authorized the Respondent to use the HDI trademark.

The Complainants submit that the Respondent is not using the disputed domain name in connection with a bona fide offering of goods or services or carrying out a legitimate noncommercial use of it. According to them, the Respondent has registered the disputed domain name with the intent to tarnish their HDI trademark and disrupt their business, and in an attempt to gain commercially from Internet users searching for the Complainants.

The Complainants point out that the disputed domain name automatically redirects Internet users to a website that offers sports betting, lotto and other betting and gambling services provided by the Asian online bookmaker 23Win and contains explicit sexualized advertising. According to the Complainants, the Respondent consciously accepts that interested Internet users would be confused that this website is operated by the Complainants.

The Complainants contend that the disputed domain name was registered and is being used in bad faith. According to them, their HDI trademark enjoys a strong reputation achieved through its global use, and the Respondent must have been well aware of their business and of the HDI trademark when registering the disputed domain name. The Complainants maintain that the redirection of visitors to a gambling and betting services website with sexually-explicit advertising tarnishes their HDI trademark, and the Respondent's intent is to attract internet users looking for the Complainants' authorized websites or information and divert them to its gambling and betting website for its own commercial gain.

## **B. Respondent**

The Respondent did not reply to the Complainants' contentions.

## **6. Discussion and Findings**

### **6.1. Procedural issue – Consolidation of Complainants**

Paragraph 10(e) of the Rules grants a panel the power to consolidate multiple domain name disputes.

Section 4.11.1 of the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, (“[WIPO Overview 3.0](#)”), discusses that in assessing whether a complaint filed by multiple complainants may be brought against a single respondent, panels look at whether (i) the complainants have a specific common grievance against the respondent, or the respondent has engaged in common conduct that has affected the complainants in a similar fashion, and (ii) it would be equitable and procedurally efficient to permit the consolidation.

The Complaint has been jointly filed by the two Complainants. They are affiliated to each other and are joint owners of the HDI trademark. They describe a common grievance against the Respondent, where it has allegedly engaged in a conduct that has affected their rights in a similar fashion. The Respondent has not expressed any views on the issue of consolidation of the Complainants, and it appears to the Panel that it would be procedurally efficient and equitable for the Complainants to be consolidated.

Taking the above into account, and on the basis of paragraph 10(e) of the Rules, the Panel allows the consolidation of the Complainants in this proceeding.

### **6.2. Substantive issues**

#### **A. Identical or Confusingly Similar**

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 Complainant's trademark and the disputed domain name. [WIPO Overview 3.0](#), section 1.7.

The Complainants have shown rights in respect of the HDI trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The Panel finds the HDI trademark is recognizable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the HDI trademark for the purposes of the Policy. [WIPO](#)

[Overview 3.0](#), section 1.7.

Although the addition of other terms (here, “online”) 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 HDI trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

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, panels have recognized that proving a respondent lacks 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 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 (although 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.

Having reviewed the available record, the Panel finds the Complainants have established a *prima facie* case that the Respondent lacks rights or legitimate interests in the disputed domain name. The Respondent has not rebutted the Complainants’ *prima facie* showing and has not come forward with any relevant evidence demonstrating rights or legitimate interests in the disputed domain name such as those enumerated in the Policy or otherwise.

The disputed domain name is confusingly similar to the HDI trademark, which was registered several decades earlier and has been continuously used by the Complainants in many countries. It redirects visitors to a Vietnamese-language website offering various gambling, lottery and related services under the name 23Win. The Respondent has not provided any plausible explanation why it chose to register the disputed domain name and why it has been set up to redirect to a gambling website.

Considering the above, and in the absence of any allegation or evidence pointing to a different conclusion, the Panel finds that it is more likely than not that by registering and using the disputed domain name, the Respondent attempts to exploit the goodwill of the Complainants’ HDI trademark for commercial gain by confusing and attracting Internet users to an online gambling website, which activity cannot give rise to rights or legitimate interests of the Respondent in the disputed domain name.

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

**C. Registered and Used in Bad Faith**

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

As discussed in the section on rights and legitimate interests above, the Complainants have registered the distinctive HDI trademark several decades ago, and have continuously used it in their business in many countries. The Respondent registered the disputed domain name only recently. It is confusingly similar to the HDI trademark and its composition suggests that it represents an online location of the Complainant’s services, while the same letter sequence is not only the Complainants’ trademark, but also their trade name.

The Respondent has not submitted a Response and has not explained why it has chosen to register as a domain name the combination of the Complainants' HDI trademark and "online" and what its connection to the 23Win online gambling website is.

Considering all the above, the Panel reaches the conclusion that it is more likely than not that the Respondent had knowledge of the Complainants' HDI trademark when registering the disputed domain name, and that it has registered and used it in an intentional attempt to attract, for commercial gain, Internet users by creating a likelihood of confusion with the HDI trademark as to the affiliation or endorsement of the gambling website to which the disputed domain name redirects, which supports a finding of registration and use of the disputed domain name in bad faith under paragraph 4(b)(iv) of the Policy.

The Panel therefore finds that the Complainants have 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 <hdi-online.com> be transferred to the First Complainant HDI Global SE.

*/Assen Alexiev/  
Assen Alexiev  
Sole Panelist  
Date: August 15, 2025*