

ARBITRATION AND MEDIATION CENTER

ADMINISTRATIVE PANEL DECISION

The Royal London Mutual Insurance Society Limited v. jiang li Case No. D2025-3831

1. The Parties

The Complainant is The Royal London Mutual Insurance Society Limited, United Kingdom, represented by CSC Digital Brand Services Group AB, Sweden.

The Respondent is jiang li, China.

2. The Domain Name and Registrar

The disputed domain name <myroyallondon.com> is registered with Sav.com, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on September 19, 2025. On September 22, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 22, 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 September 24, 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 September 24, 2025.

The Center verified that the Complaint together with the amended 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 September 25, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 15, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on October 17, 2025.

The Center appointed Luca Barbero as the sole panelist in this matter on November 5, 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 was originally founded in April 1861 as The Royal London Friendly Society and began as a friendly society for the purposes of insurance, pensions, savings or cooperative banking, turning into a mutual organization in 1908.

At present, the Complainant is alleged to be the largest mutual life, pensions and investment company in the United Kingdom, and one of the top 30 mutuals globally. The Complainant registered, as of December 31, 2024, assets under management of GBP 173 billion, 8.7 million policies in force and over 4,500 employees.

The Complainant is the owner of several trademark registrations for ROYAL LONDON, including the following, as per trademark registration details submitted in the Complaint:

- United Kingdom trademark registration No. UK00912159001 for ROYAL LONDON (word mark), filed on September 20, 2013, and registered on February 12, 2014, in classes 9, 16 and 36;
- European Union trademark registration No. 012159001 for ROYAL LONDON (word mark), filed on September 20, 2013, and registered on February 12, 2014, in classes 9, 16 and 36;
- United Kingdom trademark registration No. UK00003028609 for ROYAL LONDON (figurative mark), filed on October 30, 2013, and registered on March 21, 2014, in classes 9, 16, 36 and 41;
- Ireland trademark registration No. 250128 for ROYAL LONDON (figurative mark), registered on November 04, 2013, in classes 9, 16, 36 and 41;
- European Union trademark registration No. 014564538 for ROYAL LONDON (figurative mark), filed on September 16, 2015, and registered on January 9, 2016, in class 36.

The Complainant is also the owner of the domain name <royallondon.com>, registered on October 3, 2001, and used by the Complainant to promote its services under the trademark ROYAL LONDON.

The disputed domain name <myroyallondon.com> was registered on May 16, 2024, and is pointed to a parking page featuring multiple links related to life insurance services as well as to pension retirement plans.

5. Parties' Contentions

A. Complainant

The Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain name.

Notably, the Complainant contends that the disputed domain name is confusingly similar to the trademark ROYAL LONDON in which the Complainant has rights as it reproduces the trademark in its entirety with the mere addition of the generic term "my" and the generic Top-Level Domain ("gTLD") ".com".

The Complainant further highlights that "My Royal London" is the name of the Complainant's account to access the Complainant's Helping Hand's services and submits that the addition of the term "my" to the

Complainant's ROYAL LONDON mark only further serves to underscore and increase the confusing similarity between the disputed domain name and the Complainant's mark.

The Complainant states that the Respondent has no rights or legitimate interests in respect of the disputed domain name since: i) the Respondent is in no way sponsored by or affiliated with the Complainant, and the Respondent has never been granted license, authorization or permission by the Complainant to use its trademarks in any way, including to register the disputed domain name; ii) the Respondent is not commonly known by the disputed domain name; iii) the Respondent used a privacy service to conceal its identity at the time of registering the disputed domain name; iv) the Complainant's prior rights long predate the date of registration of the disputed domain name; and v) the Respondent has not used the disputed domain name in connection with a bona fide offering of goods or services or a legitimate noncommercial or fair use, as it has redirected the disputed domain name to a parking page publishing links to third-party websites related to life insurance and pension retirement plans, some of which directly compete with the Complainant's business whilst others directly reference the Complainant and its business.

With regard to the circumstances evidencing bad faith, the Complainant indicates that considering: i) its ROYAL LONDON trademark is known internationally and was subject of trademark registrations across numerous jurisdictions worldwide; ii) the Complainant has marketed and sold its goods and services using this trademark long before the Respondent's registration of the disputed domain name; iii) the Complainant is the largest mutual life, pensions and investment company in the United Kingdom and has received over time, numerous awards and recognitions; and iv) performing searches on the Google search engine for "my royal london" returns multiple links referencing the Complainant and its business, the Respondent knew or should have known of the Complainant at the time of registering the disputed domain name.

Moreover, the Complainant submits that considering the disputed domain name redirects users to a parking page publishing pay-per-click links, including links that directly reference the Complainant, the Respondent intentionally attempted to attract users to its website for commercial gain, by creating a likelihood of confusion with the Complainant and its trademark, whilst misleading Internet users as to the source, sponsorship, affiliation or endorsement of the website, thereby demonstrating a nefarious intent to capitalize on the fame and goodwill of the Complainant's trademark.

The Complainant states that the Respondent's bad faith is also demonstrated by the Respondent's involvement in five prior cases decided under the Policy, which would demonstrate that the Respondent has engaged in a pattern of cybersquatting.

Lastly, the Complainant submits that the Respondent's use of a Whols privacy service and its failure to respond to a cease-and-desist letter sent by the Complainant further demonstrate the Respondent's bad faith.

B. Respondent

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

6. Discussion and Findings

According to paragraph 15(a) of the Rules: "A Panel shall decide a 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." Paragraph 4(a) of the Policy directs that the Complainant must prove each of the following:

- (i) that the disputed domain name registered by the Respondent is identical or confusingly similar to a trademark or service mark in which the Complainant has rights;
- (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

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 of WIPO Panel Views on Selected UDRP Questions, Third Edition ("WIPO Overview 3.0"), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. WIPO Overview 3.0, section 1.2.1. Indeed, the Complainant has provided evidence of ownership of valid trademark registrations for ROYAL LONDON.

The Panel notes that the ROYAL LONDON mark is entirely reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. WIPO Overview 3.0, section 1.7.

Although the addition of other term "my" 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.

As to the gTLD ".com", it can be disregarded under the first element confusing similarity test, being a standard registration requirement. WIPO Overview 3.0, section 1.11.1.

Therefore, 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 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 demonstrating rights or legitimate interests in the disputed domain name such as those enumerated in the Policy or otherwise.

The Panel notes that there is no relation, disclosed to the Panel or otherwise apparent from the record, between the Respondent and the Complainant. The Respondent is not an affiliate or licensee of the Complainant, nor has the Respondent obtained authorization to use the Complainant's trademark or to register the disputed domain name.

Moreover, there is no element from which the Panel could infer the Respondent's rights over the disputed domain name, or that the Respondent might be commonly known by the disputed domain name.

The Panel also finds that there is no evidence of use of the disputed domain name by the Respondent in connection with a bona fide offering of goods or services or a legitimate noncommercial or fair use without intent for commercial gain to misleadingly divert consumers or to tarnish the Complainant's trademark.

As mentioned above, the disputed domain name resolves to a parking page featuring multiple pay-per-click links related to life insurance and pension retirement plans, which are the services offered by the Complainant under the trademark ROYAL LONDON, and most of the links redirect users to websites promoting services competing with the ones of the Complainant. Panels have 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 mark or otherwise mislead Internet users. WIPO Overview 3.0, section 2.9.

Moreover, the composition of the disputed domain name, incorporating the Complainant's well-known trademark ROYAL LONDON with the prefix "my", is inherently misleading and suggests an affiliation with the Complainant, especially in view of the fact that "My Royal London" is the name of the account to access the Complainant's Helping Hand support services. Even where a domain name consists of a trademark plus an additional term, UDRP panels have largely held that such composition cannot constitute fair use if it effectively impersonates or suggests sponsorship or endorsement by the trademark owner. WIPO Overview 3.0, section 2.5.1.

Therefore, the Panel finds the second element of the Policy has also 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.

In the present case, the Panel finds that in view of the prior registration and use of the trademark ROYAL LONDON in connection with the Complainant's services in the insurance, pensions, and investment fields, promoted online via the website "www.royallondon.com", the Respondent was or should have been aware of the Complainant's trademark at the time of registration.

Moreover, considering the composition of the disputed domain name, which exactly reproduces the name of the account to access the Complainant's Helping Hand support services, and the presence of links relating to the Complainant's business and, in some cases, directly to the Complainant itself, the Panel finds that the Respondent was indeed actually aware of, and intended to target, the Complainant and its trademark.

In view of the use of the disputed domain name to redirect users to a pay-per-click page featuring sponsored links related to the Complainant's sector and leading in most cases to websites promoting services offered by competitors of the Complainant, the Panel finds that the Respondent intentionally attempted to attract Internet users to its website for commercial gain, by creating a likelihood of confusion with the Complainant's trademark as to the source, sponsorship, affiliation or endorsement of the website according to paragraph 4(b)(iv) of the Policy.

The Complainant submitted that the Respondent engaged in a pattern of bad faith registrations as it was previously involved in the following prior UDRP cases: Les Restaurants du Cœur – Les Relais du Cœur contre jiang li, WIPO Case No. D2024-4942; M and M Direct Limited v. Jiang Li, WIPO Case No. D2024-0946; Epic Systems Corporation v. 蒋黎 (Jiang Li), WIPO Case No. D2022-1374; Rady Children's Hospital and Health Center v. 蒋黎 (Jiang Li), WIPO Case No. D2022-0390; and Great-West Life & Annuity Insurance Company d/b/a Empower Retirement v. Whois Privacy, Private by Design, LLC / Jiang Li, Yihuanlu, WIPO Case No. DC02021-0005. The Panel notes that in all such cases the domain names were redirected, like in the present case, to pay-per-click pages, and that the panels ordered the transfer of the domain names to the complainants, finding that they were registered and used in bad faith. Therefore, the

Panel finds that paragraph 4(b)(ii) of the Policy is also applicable in this case as the Respondent has registered the disputed domain name in order to prevent the Complainant from reflecting its trademark in a corresponding domain name, and has engaged in a pattern of such conduct as it registered multiple trademark-abusive domain names corresponding to third-party marks. WIPO Overview 3.0, section 3.1.2.

The Panel also finds that, under the circumstances, the Respondent's failure to submit a Response to provide any explanation for the registration of the disputed domain name or evidence of actual or contemplated good faith use further demonstrate the Respondent's bad faith.

Therefore, the Panel finds that the Complainant has established the third element of the Policy as well.

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 <myroyallondon.com> be transferred to the Complainant.

/Luca Barbero/ Luca Barbero Sole Panelist

Date: November 19, 2025