ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
Tempcover Ltd v. Whois Agent, Netlify Inc
Case No. D2026-0582

1. The Parties

The Complainant is Tempcover Ltd, United Kingdom, represented by Venner Shipley LLP, United Kingdom.

The Respondent is Whois Agent, Netlify Inc, United States of America ("United States").

2. The Domain Name and Registrar

The disputed domain name <verify-tempcover.com> is registered with Name.com, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on February 11, 2026. On February 12, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On February 12, 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 (Redacted for Privacy, Netlify Inc) and contact information in the Complaint. The Center sent an email communication to the Complainant on February 16, 2026, 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 February 19, 2026.

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 February 23, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 15, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on March 17, 2026.

The Center appointed Federica Togo as the sole panelist in this matter on March 25, 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

It results from the Complainant's undisputed allegations that it is part of the RVU Group of companies and is active in the insurance services sector. It is the registered owner of several trademarks consisting of and/or containing "tempcover", e.g. UK trademark registration No. UK00003399923 TEMPCOVER (figurative) registered on August 16, 2019, for services in class 36; UK trademark registration No. UK00002515637 TEMPCOVER.COM (word) registered on December 4, 2009, for services in class 36.

The Complainant offers short-term car insurance from its official website at "www.tempcover.com".

The disputed domain name was registered on January 9, 2026. Furthermore, the undisputed evidence provided by the Complainant proves that the disputed domain name resolved to log-in website displaying "*Access Your Policy - Enter your details to access your policy documents - Email Address - Policy Number*" and reproducing without authorization in a prominent way the Complainant's trademark and logo.

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 Complainant's trademark since it consists of the Complainant's identical trade mark TEMPCOVER.COM with the word "verify" separated by a hyphen.

The Complainant further contends that the Respondent has no rights or legitimate interests in the disputed domain name. According to the Complainant, the use of the Complainant's marks is not authorised by the Complainant. The use of the website, including use of the Tempcover logo is clear evidence that the Respondent knew of the Complainant and the Complainant's website when it applied to register the disputed domain name. In fact, the disputed domain name resolved to a website which displays the Complainant's Tempcover Logo and invites users to insert personal details in order to access their policy documents (being the documents which are issued after an insurance policy is purchased). There is no evidence that the Respondent has ever used or made preparations to use the disputed domain name or the name Tempcover in connection with a legitimate business, or that it has otherwise been known by the disputed domain name. Rather, it is clear that the Respondent is trying to impersonate the Complainant by using the disputed domain name to resolve to a website which uses the Complainant's marks and refers to accessing policy documents.

Furthermore, the Complainant contends that the disputed domain name was registered and is being used in bad faith. According to the Complainant, the use of the disputed domain name to resolve to a website which incorporates the Complainant's marks and misleads consumers to believe it is the Complainant's website, is clearly done intentionally to impersonate the Complainant and to deceive consumers into thinking the disputed domain name is operated by or connected to the Complainant. The use of signs identical to the Complainant's marks on the website to allegedly offer access to "policy documents" (being the documents which would be issued by the Complainant after an insurance policy is purchased) will obviously result in confusion on the part of Internet users. Given the Complainant's significant reputation in the Complainant's marks, it is inconceivable that the Respondent was unaware of the Complainant's business when registering the disputed domain name. The Respondent's knowledge of the Complainant's business is further evidenced by the Respondent's use of the Complainant's marks on the website and the reference to policy documents and a policy number, which demonstrates an understanding of the Complainant's field of business. Further, the Respondent has been engaged in a pattern of bad faith behaviour.

B. Respondent

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

6. Discussion and Findings

Paragraph 15(a) of the Rules instructs this Panel to "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 requires a complainant to prove each of the following three elements in order to obtain an order that each domain name be transferred or cancelled:

(i) the domain name is identical or confusingly similar to a trademark or service mark in which the complainant has rights; and

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

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

The Panel will therefore proceed to analyze whether the three elements of paragraph 4(a) of the Policy are satisfied.

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 Select UDRP Questions ("WIPO Overview 3.1"), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. WIPO Overview 3.1, section 1.2.1. It is true that said trademark is a figurative trademark, containing a design element. However, although it is acknowledged that also such figurative marks would satisfy the requirement that a complainant show "rights in a mark", panels would tend to focus on the non-design elements for purposes of assessing confusing similarity. WIPO Overview 3.1, section 1.10.

The above test typically involves a side-by-side comparison of the domain name and the textual components of the relevant trademark to assess whether the mark is recognizable within the domain name. In the case at hand, the entirety of the mark's textual component TEMPCOVER is reproduced within the disputed domain name. The Panel finds the mark is recognizable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. WIPO Overview 3.1, section 1.7.

Although the addition of other terms (here, verify and a hyphen) 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 3.1, 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 that 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 3.1, 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 the disputed domain name is clearly constituted by the Complainant's trademark preceded by the additional term "verify". The Panel finds it most likely that the Respondent registered the disputed domain name with the intention of suggesting an affiliation with the Complainant. This is also confirmed by the content of the website to which the disputed domain name resolved, a log-in website displaying "*Access Your Policy - Enter your details to access your policy documents - Email Address - Policy Number*", reproducing in a prominent way and without authorization the Complainant's trademark and logo. Such composition of domain names cannot constitute fair use if it effectively impersonates or suggests sponsorship or endorsement by the trademark owner. See section 2.5.1 of the WIPO Overview 3.1. This is the case in the present proceeding.

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 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.

One of these circumstances is that the Respondent by using the disputed domain name, has intentionally attempted to attract, for commercial gain, Internet users to its website or other online location, by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of its website or location or of a product or service on its website or location (paragraph 4(b)(iv) of the Policy).

In the present case, the Panel notes that it results from the Complainant's documented allegations that the disputed domain name resolved to a log in website displaying prominently and without authorization the Complainant's registered trademark and logo.

By the time the disputed domain name was registered, the Panel considers it to be unlikely that the Respondent did not have knowledge of the Complainant and its marks, which are entirely included in the disputed domain name. Consequently, and in the absence of any evidence to the contrary, the Panel is convinced that the Respondent also knew that the disputed domain name included the Complainant's trademark when it registered the disputed domain name.

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 3.1, section 3.2.1.

In this regard, the further circumstances surrounding the disputed domain name's registration and use confirm the Panel's findings that the Respondent has registered and is using the disputed domain name in bad faith:

(i) the nature of the disputed domain name (incorporating the Complainant's mark plus the addition of the term "verify" tending to suggest sponsorship or endorsement by the Complainant);

(ii) the content of the website to which the disputed domain name resolved, a log-in website displaying "*Access Your Policy - Enter your details to access your policy documents - Email Address - Policy Number*" reproducing without authorization the Complainant's trademark and logo;

(iii) absence of rights or legitimate interests coupled with the Respondent's failure to provide any response or justification for its choice of the disputed domain name.

Finally, the Respondent has been involved in a number of trademark-abusive domain name registrations (e.g. *Tempcover Ltd v. Whois Agent, Netlify Inc*, WIPO Case No. D2025-4289; *Belfius Bank SA / Belfius Bank NV v. Whois Agent, Netlify Inc*, WIPO Case No. D2025-0826; *Ile-de-France Mobilités v. Whois Agent, Netlify Inc*, WIPO Case No. D2020-0739). In the view of the Panel, this behavior demonstrates a pattern of conduct by the Respondent of taking advantage of trademarks of third parties without any right to do so and is indicative of the Respondent's bad faith. Previous UDRP panels have held that establishing a pattern of bad faith conduct requires more than one, but as few as two instances of abusive domain name registration, see WIPO Overview 3.1, section 3.1.2. The Panel considers that this is the case here.

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 <verify-tempcover.com> be transferred to the Complainant.

/Federica Togo/
Federica Togo
Sole Panelist
Date: April 8, 2026