

ADMINISTRATIVE PANEL DECISION

Oversea-Chinese Banking Corporation Limited v. Sumit Bansal
Case No. D2026-1448

1. The Parties

The Complainant is Oversea-Chinese Banking Corporation Limited, Singapore, represented by CSC Digital Brand Services Group AB, Sweden.

The Respondent is Sumit Bansal, India.

2. The Domain Name and Registrar

The disputed domain name <ocbcwhhk.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 April 3, 2026. On April 7, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On April 8, 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 Purposes, Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on April 9, 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 April 14, 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 April 17, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 7, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on May 9, 2026.

The Center appointed Pascal Böhner as the sole panelist in this matter on May 14, 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 is Oversea-Chinese Banking Corporation Limited (“OCBC”), a banking and financial services corporation established in Singapore in 1932. According to the Complainant, it is the second-largest financial services group in Southeast Asia by assets and offers a range of financial services including banking, wealth management, and insurance across more than 420 branches and representative offices in 19 countries and regions.

The Complainant is the registered owner of the trademark OCBC in numerous jurisdictions. The trademark registrations relevant to the present proceeding include, inter alia:

- OCBC, Hong Kong, China Registration No. 1992B03224, registered March 23, 1989, Class 9;
- OCBC, Singapore, Registration No. T8901526J, registered May 31, 1994, Class 16;
- OCBC, European Union, Registration No. 000077073, registered October 23, 1998, Classes 9, 16, 35, and 36.

The Complainant holds additional OCBC trademark registrations in Malaysia, China, the United States of America, the United Kingdom, and various other jurisdictions.

In 2014, the Complainant acquired Wing Hang Bank, a Hong Kong, China-based financial institution. Following the acquisition, Wing Hang Bank became a wholly-owned subsidiary of the Complainant and was subsequently renamed OCBC Bank (Hong Kong) Limited. This subsidiary operates as the Complainant’s banking presence in Hong Kong, China, offering commercial and consumer banking services under the OCBC brand. The Complainant maintains a website for its Hong Kong, China, operations at “www.ocbc.com.hk”.

The disputed domain name was created on May 28, 2014. According to the Whois history submitted with the Complaint, the disputed domain name was previously registered by the Complainant. Based on the historical Whois records on file, the registration transitioned to a new registrant in or around July 2025.

The Registrar confirmed the Respondent, Sumit Bansal, as the current underlying registrant of the disputed domain name. The Respondent is based in India, and is seemingly associated with a website operating a search engine optimization (“SEO”) business.

At the time of filing of the Complaint, the disputed domain name resolved to a generic WordPress blog placeholder page containing no substantive content. The Complainant sent multiple cease-and-desist letters to the Respondent, which remained unanswered.

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 its OCBC trademark because the mark is incorporated in its entirety in the disputed domain name, and the added letters “whhk” – which the Complainant submits is an abbreviation for “Wing Hang Hong Kong,” referencing its Hong Kong, China subsidiary – do not prevent the finding of confusing similarity but rather reinforce it.

The Complainant further contends that the Respondent has no rights or legitimate interests in the disputed domain name, as the Respondent is not commonly known by the name, has not been licensed or authorized by the Complainant, and is using the disputed domain name merely to host a generic blog placeholder. The Complainant also contends that the Respondent registered and is using the disputed domain name in bad faith, pointing to, among other factors, the specific composition of the disputed domain name, the Respondent's acquisition of the disputed domain name shortly after the Complainant had inadvertently let it expire, the Respondent's use of a privacy registration service, the Respondent's failure to respond to cease-and-desist letters, the Respondent's SEO business model, and a prior UDRP proceeding against the Respondent.

B. Respondent

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

6. Discussion and Findings

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 the registered trademark OCBC for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The disputed domain name incorporates the Complainant's OCBC trademark in its entirety and adds the letters "whhk." The Complainant's trademark is clearly recognizable within the disputed domain name. Although the addition of other terms may bear on assessment of the second and third elements, the Panel finds the addition of such letters 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 generic Top-Level Domain ".com" is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test. [WIPO Overview 3.1](#), section 1.11.1.

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.

In reaching this finding, the Panel notes the following. The Respondent is identified as “Sumit Bansal,” a name bearing no resemblance to the disputed domain name. There is no evidence that the Respondent has ever been commonly known by the disputed domain name. The Complainant has not licensed, authorized, or otherwise permitted the Respondent to use the OCBC trademark or to register any domain name incorporating it. The disputed domain name resolves to a generic WordPress blog placeholder page with no substantive content, which does not constitute a bona fide offering of goods or services or a legitimate noncommercial or fair use of the disputed domain name.

The Panel further notes that the term “ocbcwhhk” has no apparent dictionary meaning. As the evidence on file demonstrates, the disputed domain name was used by the Complainant itself as the domain name for its Hong Kong, China banking subsidiary’s website. The Respondent, who seemingly operates a SEO business, has not advanced any explanation as to how it could have selected this particular domain name without reference to the Complainant’s mark and operations. In the absence of any Response, and given the highly specific nature of the term as related to the Complainant, the Panel finds no basis for finding any rights or legitimate interests on the part of the Respondent.

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.

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.

Registration in bad faith

The Panel finds that the Respondent most likely registered the disputed domain name with knowledge of and targeting the Complainant’s trademark. Several factors support this conclusion.

First, the Complainant’s OCBC trademark has been registered in multiple jurisdictions since 1989, i.e., decades before the Respondent acquired the disputed domain name. The Complainant has used the trademark continuously since 1932 in connection with banking and financial services.

Second, the composition of the disputed domain name is highly specific. The disputed domain name does not consist of generic or dictionary terms but reproduces the Complainant’s OCBC trademark in full and appends the letters “whhk.” The Panel notes that the evidence on file – in particular historical WhoIs records – establishes that the Complainant itself previously used the disputed domain name as the website address for its Hong Kong, China banking subsidiary. The Respondent has offered no alternative explanation for its selection of this particular domain name. In the absence of any such explanation, the Panel considers that the Respondent deliberately selected a domain name that it knew or at least should have known to be associated with the Complainant.

Third, the timing of the Respondent’s acquisition is significant. The historical WhoIs records show that the disputed domain name transitioned to a new registrant on or around July 3, 2025, shortly after the Complainant let it expire and it became available. This timing, combined with the specific composition of the disputed domain name, reinforces the inference that the Respondent was aware of the Complainant’s prior use and deliberately targeted the mark.

Fourth, the Respondent is seemingly associated with a website operating a SEO business, which suggests that the Respondent possesses the expertise to assess the value associated with a domain name previously used by a financial institution. A simple Internet search for “ocbc whhk”, as evidenced by the search results submitted with the Complaint, returns top results exclusively related to the Complainant and its Hong Kong, China operations. The Respondent most likely was aware of the Complainant’s trademark when acquiring the disputed domain name.

Use in bad faith

Panels have found that the non-use of a domain name (including a blank or “coming soon” page) would not by itself prevent a finding of bad faith under the doctrine of passive holding. To the contrary, in looking at the totality of circumstances in each case, panels have found that the registration and non-use of a domain name can still constitute bad faith for purposes of the Policy. [WIPO Overview 3.1](#), section 3.3.

Having reviewed the available record, the Panel notes the distinctiveness of the Complainant’s OCBC trademark and the composition of the disputed domain name (which previously served as the website for the Complainant’s Hong Kong, China subsidiary) and finds that in the circumstances of this case the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

The Panel additionally notes that the Respondent’s failure to reply to the Complainant’s multiple cease-and-desist letters, while not dispositive on its own, is a further factor supporting a finding of bad faith in the overall circumstances of this case.

In summary, having considered the totality of the circumstances, such as the Complainant’s longstanding trademark registrations, the highly specific composition of the disputed domain name which was previously owned by the Complainant and used as a website for its Hong Kong, China subsidiary, the timing of the Respondent’s acquisition, the Respondent’s likely SEO expertise, the results of Internet searches, and the Respondent’s failure to reply to cease-and-desist correspondence or to this proceeding – the Panel finds that the Respondent’s passive holding does not prevent a finding of bad faith in the circumstances of this case.

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 <ocbcwhhk.com> be transferred to the Complainant.

/Pascal Böhner/

Pascal Böhner

Sole Panelist

Date: May 28, 2026