ADMINISTRATIVE PANEL DECISION
SAP SE v. Mahelaka Khanam
Case No. D2026-2864

1. The Parties

The Complainant is SAP SE, Germany, represented by K & G Law LLC, United States of America.

The Respondent is Mahelaka Khanam, India, self-represented.

2. The Domain Name and Registrar

The disputed domain name <sapmate.com> is registered with Hostinger Operations, UAB (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on June 30, 2026. On July 1, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 6, 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 (Unknown Registrant) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 6, 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 July 6, 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 July 7, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 27, 2026. The Response was filed with the Center on July 14, 2026. In its email communication dated July 22, 2026, the Respondent confirmed that it submitted its complete Response in this case.

On July 23, 2026, the Complainant made an unsolicited supplemental filing. On July 24, 2026, the Respondent requested to submit a response to the Complainant's supplemental filing. Following the Administrative Panel Procedural Order 1, the Respondent submitted its Response to the Complainant's Supplemental Filing on August 11, 2026.

The Center appointed Mehmet Polat Kalafatoglu as the sole panelist in this matter on August 3, 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, SAP SE, founded in 1972 and headquartered in Germany, offers business software and software-related services. It notes that it has more than 300 million cloud users, more than 100 solutions covering all business functions, and employs 111,038 people worldwide. In addition to providing enterprise software and software-related services, the Complainant also offers training services for its large customer and partner community via its training page located at <training.sap.com>.

The Complainant asserts that it owns hundreds of trademark registrations for its SAP trademark, and formatives, in all major markets around the globe, including the following trademarks:

- the International trademark registration No. 726890 for SAP, registered on November 15, 1999; and
- the International trademark registration No. 638470 for SAP, registered on June 2, 1995.

The disputed domain name was registered on April 7, 2024. At the time of filing the Complaint and this Decision, it resolves to a website offering different training, including particularly SAP-related training and career services. At the time of this Decision, the Panel notes that the following disclaimer has been added at the bottom of the webpage, written in small characters: "Disclaimer: Sapmate is an independent IT training institute. We are not affiliated with, sponsored by, or related to SAP SE."

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. The Complainant's contentions are summarized below.

First, the disputed domain name fully incorporates the Complainant's well-known trade name and registered trademark. The likelihood of confusion is reinforced by the training services offered through the Respondent's website.

Second, the Respondent has no rights in or a legitimate, bona fide business purpose for using the disputed domain name. The Respondent has no trademark rights or any other legitimate rights in the SAP trademark, nor has it been authorized or licensed by the Complainant to use this trademark to offer SAP training. The Respondent is not a reseller and is not an authorized partner or consultant. The Respondent is seeking to capitalize on the Complainant's brand and to lure customers seeking legitimate and authorized SAP training.

Third, the disputed domain name was registered and is being used in bad faith. Particularly, the Complainant submits that the Respondent acted in disregard of the trademark rights of SAP and the disputed domain name is trading on SAP's goodwill to attract users to the Respondent's website.

In its supplemental filing dated July 23, 2026, the Complainant noted, inter alia, that the Respondent included four video links in the Response, ostensibly to show that the training services offered are not limited to SAP. According to the Complainant, a review of the videos reveals that the students were attracted to the disputed domain name because they wanted to learn about SAP software.

B. Respondent

In its Response, the Respondent submits that it is an independent educational institute. It always maintained clear disclaimers regarding its independent status. It operates as a legally registered business under the Government of India's micro, small, and medium enterprises framework, and provides a trade registration certificate indicating "SAPMATE SKILL ACADEMY" as the name of the enterprise with a date of commencement of business on May 14, 2025. It is not an SAP-specific entity, and it provides comprehensive IT training covering other software as well. The Respondent states that it does not sell official SAP software, licenses, or corporate services. It also notes the following: "while we previously explored official partnership options, the high costs were completely prohibitive for a grassroots, student-focused institute like ours". It noted that the student testimonials/feedback and social media documentation demonstrate their genuine footprint as an independent educator. The Respondent also notes that it is entirely willing to add further prominent, explicit disclaimers on its homepage "to ensure absolutely no confusion exists in the market".

In its supplemental filing dated August 11, 2026, the Respondent disputes some of the Complainant's comments made in relation to the four videos included in the Response. Particularly, the Respondent argues that teaching students how to use or work with SAP-related technologies does not, by itself, constitute a representation that the training provider is SAP SE or an authorized SAP partner. Regarding one of the student statements, the Respondent contends that this statement does not establish that the Respondent represented itself as being owned, operated, sponsored, or endorsed by the Complainant. The Respondent does not deny being aware of SAP or of the importance of SAP-related technologies. However, there is a fundamental distinction between attracting students who are interested in learning SAP-related technologies and misleading those students into believing that the training provider is SAP SE or is officially authorized by SAP SE. The Respondent notes that other independent third-party education providers also offer courses concerning SAP technologies. Lastly, the Respondent is not an SAP-only business. Its curriculum includes other IT subjects.

6. Discussion and Findings

6.1. The Admissibility of the Parties' Supplemental Filings

As noted above, the Center received the Complainant's unsolicited supplemental filing addressing the statements made by the Respondent in the Response and summarizing the information in the video links provided by the Respondent. Following the Administrative Panel Procedural Order 1, which invited the Respondent to make a submission limited to reply only to the Complainant's supplemental filing, the Respondent submitted its supplemental filing on August 11, 2026.

Pursuant to paragraph 10(d) of the Rules, the Panel has discretionary authority to determine "the admissibility, relevance, materiality, and weight of the evidence" submitted by the Parties. The Panel considers that these submissions are brief and their review would not cause any delay to the proceedings. Considering also the procedural fairness, the Panel has exceptionally taken all these submissions into account as part of the record.

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 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.

The entirety of the mark is 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 3.1, section 1.7.

Although the addition of other terms here, "mate", 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. Although the Respondent filed a Response, the Panel finds that the Respondent has not rebutted the Complainant's prima facie showing and has not come forward with any relevant and sufficient evidence demonstrating rights or legitimate interests in the disputed domain name such as those enumerated in the Policy or otherwise.

The Panel considers the Complainant's assertion that the Respondent is not authorized to use the SAP trademark, and that the Respondent is not a reseller of SAP products or an official SAP training provider. The Panel finds that the composition of the disputed domain name, which reproduces the well-known SAP trademark with the addition of the term "mate", carries a risk of implied affiliation with the Complainant, as it falsely suggests an affiliation with the Complainant and that the Respondent is authorized to offer official SAP-related training. Furthermore, the Panel notes that the disputed domain name is used for offering SAP-related training but that the Respondent also provides other IT courses. The Panel also notes that at the time of filing the Complaint, the website located at the disputed domain name did not display a disclaimer clearly stating that there is no connection between the Parties. Only after the notification of the Complaint, the Respondent added a disclaimer at the bottom of the webpage written in small characters, which remains insufficient to inform Internet users adequately. In the Panel's view, the composition of the disputed domain name and its use, combined with the absence of a disclaimer on the website (and the inadequacy of the disclaimer added following the notification of the Complaint), are likely to mislead Internet users seeking official SAP training. In particular, the Panel notes the Respondent's statement that it had previously explored official partnership options with the Complainant but was unable to establish them due to high costs. Under these circumstances, the Panel finds that, by offering SAP-related training via the disputed domain name, which directly competes with the Complainant's training services, the Respondent acted with the intention to take unfair advantage of the SAP trademark for its commercial gain.

In addition, the Panel finds that the Respondent's use of the disputed domain name does not meet the cumulative requirements outlined in the "Oki Data test" laid out in *Oki Data Americas, Inc. v. ASD, Inc.*, WIPO Case No. D2001-0903, since the website at the disputed domain name does not accurately and prominently disclose the Respondent's lack of relationship with the Complainant and, as stated by the Respondent, it offers SAP-related training along with third-party related offerings. See, WIPO Overview 3.1, section 2.8.

Lastly, regarding the trade registration certificate submitted by the Respondent, the Panel refers to WIPO Overview 3.1, section 2.12.2, which notes that the existence of a respondent's registered business name does not automatically confer rights or legitimate interests on the respondent. Considering the overall circumstances of the case, while the Panel cannot question the validity of this trade registration certificate in that particular jurisdiction, the Panel finds that this registration certificate does not provide the Respondent with rights or legitimate interests with respect to the disputed domain name for the purposes of the UDRP.

Accordingly, 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.

Under the circumstances of the present case, the Panel finds that the disputed domain name was registered and is being used in bad faith.

First, the Panel reminds that the mere registration of a domain name that is confusingly similar to a famous or widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith. WIPO Overview 3.1, section 3.1.4.

Second, the Respondent noted that it was aware of the Complainant and its products. It also noted that it had previously explored official partnership options with the Complainant but was unable to create such a partnership. Considering also the Panel's determinations under the second element, the Panel finds that the Respondent was aware of the well-known SAP trademark and registered the disputed domain name to take unfair advantage of the Complainant's trademark to offer – among other competing IT-related training – SAP-related training services that compete with the Complainant following its failure to establish an official partnership.

Second, considering the use of the disputed domain name described above, the Panel finds that the Respondent, by using the disputed domain name, has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's well-known SAP trademark as to the source, sponsorship, affiliation, or endorsement of its website.

Accordingly, 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 <sapmate.com> be transferred to the Complainant.

/Mehmet Polat Kalafatoglu /
Mehmet Polat Kalafatoglu
Sole Panelist
Date: August 17, 2026