ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
Belfius Bank SA / Belfius Bank NV v. abo lahab
Case No. D2026-4138

1. The Parties

The Complainant is Belfius Bank SA / Belfius Bank NV, Belgium, represented internally.

The Respondent is abo lahab, Thailand.

2. The Domain Names and Registrar

The disputed domain names <digi-belfius.com>, and <digipass-belfius.com> are registered with Dynadot Inc (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on September 15, 2026. On September 16, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On September 17, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names 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 18, 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 September 22, 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 September 24, 2026. In accordance with the Rules, paragraph 5, the due date for Response was October 14, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on October 19, 2026.

The Center appointed Fabrice Bircker as the sole panelist in this matter on October 28, 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

According to uncontested elements provided by the Complainant, the latter, Belfius Bank SA / Belfius Bank NV, is a Belgian bank and financial services provider counting approximately 5,000 employees and 650 agencies.

It is known under the name BELFIUS, which is notably protected through the following trademark:

BELFIUS, European Union Trade Mark registration No. 010581205, filed on January 23, 2012, registered on May 24, 2012, duly renewed in 2022, and protecting products and services of classes 9, 16, 35, 36, 41, and 45.

The Complainant has also an online presence through domain names such as <belfius.be> or <belfius.com>, respectively registered since January 23, 2012, and January 20, 2012.

The disputed domain names, <digipass-belfius.com> and <digi-belfius.com>, were respectively registered on September 2, 2026, and September 4, 2026.

At the time of the drafting of the Decision, they both trigger a browser warning indicating that the associated website has been reported as unsafe and alerting users to phishing risks.

At the time of filing the Complaint, <digi-belfius.com> already triggered the same browser warning, while <digipass-belfius.com> resolved to an error page.

Very little is known about the Respondent, except that, based on the information disclosed by the Registrar, it is apparently located in Thailand.

Before filing the Complaint, the Complainant contacted the Registrar, but to no avail.

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 names.

Notably, the Complainant contends that the disputed domain names are confusingly similar to its BELFIUS trademark, because they reproduce the latter, and the added elements do not prevent it from being recognizable.

Besides, the Complainant argues that the Respondent has no rights or legitimate interests in respect of the disputed domain names, in substance because:

- the Complainant's trademark predates the registration of the disputed domain names;

- the Complainant has never authorized the Respondent to register and/or use any domain name incorporating its trademark;

- the Respondent has no trademark rights on “belfius” and does not seem to carry out any activity; and

- the Respondent is not making a legitimate noncommercial or fair use of the disputed domain names, as they are not used in connection with any active website and there is no indication of any preparation to use them for a legitimate purpose.

Then, the Complainant contends that the disputed domain names have been registered and are being used in bad faith, notably because:

- the Complainant’s trademark dates back to 2012, whereas the disputed domain names were registered in September 2026; the Respondent thus either knew or should have known of the Complainant’s trademark, or else exercised the kind of willful blindness that numerous panels have held to support a finding of bad faith;

- had the Respondent conducted good faith searches before registering the disputed domain names, it would have readily found reference to the Complainant and appreciated the likelihood of confusion with the disputed domain names;

- the Complainant has established a substantial presence on the Internet, as it owns more than 200 domain names incorporating its trademark;

- the absence of use of the disputed domain names amounts to bad faith use by virtue of the passive holding doctrine; and

- the concealment of the Respondent’s identity is an indication of bad faith, as this was not motivated by a legitimate need to protect the Respondent’s identity, but solely by the intention to make it difficult for the Complainant to protect its trademark rights.

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.

Based on the available record (Annexes 3 to 6 of the Complaint), the Panel finds that 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 BELFIUS mark is reproduced within the disputed domain names. Accordingly, the Panel finds the mark recognizable within the disputed domain names, which are therefore confusingly similar to the mark for the purposes of the Policy. WIPO Overview 3.1, section 1.7.

Indeed, although the addition of other terms, here respectively “digipass-” and “digi-”, may bear on assessment of the second and third elements, the Panel finds the addition of such terms does not prevent a finding of confusing similarity between the disputed domain names and the mark for the purposes of the Policy. WIPO Overview 3.1, section 1.8.

Regarding the generic Top-Level Domains (“gTLD”) “.com”, in the disputed domain names, it is well established that gTLDs do not generally affect the assessment of domain names for the purpose of determining identity or confusing similarity. 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 names. 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 names such as those enumerated in the Policy or otherwise.

Indeed, the Complainant contends that it has not given its consent to the Respondent to use its BELFIUS trademark for domain name registrations or in any other manner.

Besides, there is nothing in the record of the case likely to indicate that the Respondent may be commonly known by the disputed domain names.

Furthermore, the disputed domain name <digi-belfius.com> already at the time of submitting the Complaint, and the disputed domain name <digipass-belfius.com> at the time of rendering this Decision, resolve to a warning page displayed by the Web browser alerting Internet users that the corresponding websites may be dangerous. Such circumstances are inconsistent with any bona fide offering of goods or services, or any legitimate noncommercial or fair use of the disputed domain names made without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

Indeed, Panels have held that the use of a domain name for illegitimate activity such as phishing/identity theft, distributing malware, unauthorized account access/hacking, copycat sites, passing off, or other types of fraud, can never confer rights or legitimate interests on a respondent. WIPO Overview 3.1, section 2.13.1.

Finally, the Respondent has not replied to the Complainant’s contentions.

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

C. Registered and Used in Bad Faith

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that domain names were registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent's registration and use of domain names is in bad faith. WIPO Overview 3.1, section 3.2.1.

In the present case, the Panel notes that:

- the disputed domain names reproduce the Complainant's BELFIUS trademark;

- this trademark predates the registration of the disputed domain names by nearly 15 years;

- the Respondent registered not merely one, but two disputed domain names;

- the BELFIUS trademark is a coined and distinctive term associated with a major Belgian bank,

- the elements added to "belfius" in the disputed domain names, namely "digipass-" and "digi-", may refer to an online authentication service or process used by the Complainant's bank;

- the Respondent has a clear absence of rights and despite having been given the opportunity to participate in these proceedings, failed to do so and has not put forward any argument to establish its good faith; and

- when typed into a browser, the disputed domain name <digi-belfius.com> already at the time of submitting the Complaint, and the disputed domain name <digipass-belfius.com> at the time of rendering this Decision, trigger a warning message indicating that the associated websites may be dangerous, and alerting users of phishing risks.

In view of these elements, the Panel finds that it is more likely than not that the Respondent registered the disputed domain names with the Complainant's trademark in mind with the intention of taking unfair advantage of it, that is to say in bad faith.

Besides, the warning message triggered by the disputed domain names gives reason to believe that they are being used for illegitimate purposes.

In this respect, Panels have held that the use of a domain name for illegitimate activity such as phishing/identity theft, distributing malware, unauthorized account access/hacking, copycat sites, passing off, or other types of fraud, constitutes bad faith. WIPO Overview 3.1, section 3.4.

The disputed domain name <digipass-belfius.com> not being actively used at the time of filing the Complaint, in the circumstances of the present case, this would not prevent a finding of bad faith under the doctrine of passive holding. WIPO Overview 3.1, section 3.3.

Indeed, the Panel notes i) the distinctiveness and reputation of the Complainant's trademark, ii) the composition of the disputed domain name in as far as it refers to the Complainant, iii) the failure of the Respondent to submit a response, iv) the clear absence of rights of the Respondent, and v) the implausibility of any good faith use of the disputed domain name by the Respondent in this context, 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 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 names <digi-belfius.com> and <digipass-belfius.com> be transferred to the Complainant.

/Fabrice Bircker/
Fabrice Bircker
Sole Panelist
Date: November 9, 2026