



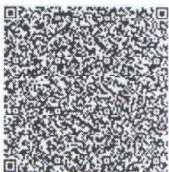
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INDIA NON JUDICIAL

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e-Stamp

Certificate No.	: IN-DL14471496708908T
Certificate Issued Date	: 24-Aug-2021 03:57 PM
Account Reference	: SELFPRINT (PU)/ dl-self/ NEHRU/ DL-DLH
Unique Doc. Reference	: SUBIN-DLDEL-SELF25849604100177T
Purchased by	: KARNIKA SETH
Description of Document	: Article 12 Award
Property Description	: ARBITRATION AWARD UNDER INDRP POLICY
Consideration Price (Rs.)	: 0 (Zero)
First Party	: KARNIKA SETH
Second Party	: NOT APPLICABLE
Stamp Duty Paid By	: KARNIKA SETH
Stamp Duty Amount(Rs.)	: 100 (One Hundred only)



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**SELF PRINTED CERTIFICATE
TO BE VERIFIED BY THE RECIPIENT**

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ARBITRATION AWARD

Before the Sole Arbitrator, Dr. Karnika Seth

IN INDRP Case No. 1405

[Signature]

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2. The onus of checking the legitimacy is on the users of the certificate.
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.IN REGISTRY
(NATIONAL INTERNET EXCHANGE OF INDIA)
.IN Domain Name Dispute Resolution Policy (INDRP)

Disputed Domain Name: www.saptraininginstituteurgaon.in

Dated: 25th August, 2021

IN THE MATTER OF:

SAP SE

Dietmar-Hopp-Allee 16,

69190 Walldorf,

Germany

.....Complainant

Vs.

SAPTRAINING

SysaAppPro

1 DDA Market Community Centre,

Naraina Vihar,

New Delhi-110028

.....Respondent

1. Parties

- 1.1 The Complainant in this arbitration proceeding is SAP SE, having address at Dietmar-Hopp-Allee 16, 69190 Walldorf, Germany. The Complainant is represented by RNA, IP Attorneys in India.
- 1.2 The Respondent in this arbitration proceeding as per 'Whois' record is Saptraining, SysaAppPro, having address at 1 DDA Market Community Centre, Naraina Vihar, New Delhi-110028 (as per



Annexure 1 of complaint). Upon enquiry from NIXI made by the Complainant, the email address of the Respondent was found to be saptrainingins@gmail.com.

- 2. The Dispute-** The domain name in dispute is “www.saptraininginstituteurgaon.in” registered by the Respondent on 22nd December, 2016. According to the .IN ‘Whois’ search, the Registrar of the disputed domain name is HIOX Softwares Private Limited.


3. Important Dates

S. No	Particulars	Dates (All communication in electronic mode)
1.	Date on which NIXI’s email was received for appointment as Arbitrator.	July 8, 2021
2.	Date on which consent was given to act as an Arbitrator in the case.	July 8, 2021
3.	Date of Appointment as Arbitrator.	July 12, 2021
4.	Soft Copy of complaint and annexures were received from NIXI through email.	July 12, 2021
5.	Date on which notice was issued to the Respondent	July 13, 2021
6.	Date on which Complainant filed proof of completed service of complaint on Respondent	Aug 23, 2021
7.	Date on which Award passed	Aug 25, 2021



4. Procedural History

- 4.1 This is mandatory arbitration proceeding in accordance with the .IN Domain Name Dispute Resolution Policy (INDRP) adopted by the National Internet Exchange of India (NIXI). The INDRP Rules of Procedure (the Rules) were approved by NIXI on 28th June, 2005 in accordance with the Indian Arbitration and Conciliation Act, 1996. The updated rules are available on <https://www.registry.in/INDRP%20Rules%20of%20Procedure>. By registering the disputed domain name with accredited Registrar of NIXI, the Respondent agreed to the resolution of the dispute pursuant to the .IN Dispute Resolution Policy and Rules framed thereunder.
- 4.2 In accordance with the Rules 2(a) and 4(a) of INDRP Rules, NIXI formally notified the Respondent of the complaint and appointed Dr. Karnika Seth as a sole arbitrator for adjudicating upon the dispute in accordance with the Arbitration and Conciliation Act, 1996 and the rules framed thereunder. The Arbitrator submitted the statement of Acceptance and Declaration of impartiality and independence, as required by NIXI.
- 4.3 The complaint was filed in accordance with the requirements of the .IN Domain Name Dispute Resolution.
- 4.4 The Arbitrator issued notice to the Respondent on 13 July 2021 at the email address saptrainingins@gmail.com calling upon the Respondent to submit his reply to the complaint within fifteen (15) days of receipt of the Arbitrator's email i.e., 28th July 2021. The Complainant also filed proof of completed service of the complaint (both in hard copy and electronically) upon Respondent on Aug 23rd, 2021. According to

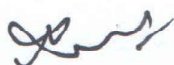


the Complainant, the courier service could not be completed as address was not found but the email service was completed.

- 4.5 Despite notice, the Respondent failed to file any reply. Therefore, in accordance with the Rule 12 of INDRP Rules, the Arbitration proceedings were conducted ex-parte and the Award is passed which is binding on both parties herein.

5. Factual Background

- 5.1 The Complainant, trading as SAP is the global market leader providing enterprise application software, business analytics and mobile solutions, and is incorporated under the laws of Germany. Founded in 1972, the Complainant is well known for providing collaborative, inter-enterprise business solutions for all types of industries.
- 5.2 The Complainant through its trademark, 'SAP' has been providing end-to-end application solutions like SAP Business Suite which optimizes all business critical processes, SAP ERP software which is used worldwide and known for its cost cutting and effective utilization of available resources.
- 5.3 The Complainant has coined and adopted the trademark SAP in 1972. The Complainant owns numerous trademark registrations using the word SAP and its formatives in many countries including India (as per **Annexure 4** of complaint). The Complainant owns exclusive rights in the 'SAP' trademark in various countries around the world including India. The trademark SAP (Device) is registered in India in class 9 under registration no.989935, 879286, 576754 and 576755 and trademark SAP (Word) is registered under class 16 under registration no.890059 and 578462 and trademark SAP (Device and Word) under



class 41 and 42 under registration no.1238968 and 1238969 (as per **Annexure 6** of complaint).

- 5.4 The Complainant has been using the “SAP” trademark distinctively for use in connection with its Corporate name, products and services and also maintains the website www.sap.com since January 18, 1995 .The Complainant also maintains a separate website www.sap.in for rendering its products and services in India since February 16, 2005 (as per **Annexure 7** of complaint).
- 5.5 The Complainant also has extensive presence and following of its trademark on social media websites such as Facebook and Twitter and on other social media platforms such as public forums, blogs, discussions, reviews. The Complainant’s trademark when searched online on search engines like Google, Yahoo, Bing etc. shows SAP in search results pertaining to only the Complainant.
- 5.6 The Respondent in this administrative proceeding as per ‘Whois’ database is SAPTRAINING, SysaAppPro having address at 1 DDA Market Community Centre, Naraina Vihar, New Delhi-110028 (as per **Annexure 1** of the complaint). Upon enquiry from NIXI made by the Complainant, the email address of the Respondent was found, that is saptrainingins@gmail.com.

6. Parties Contention

6.1 Complainants’ Submissions

- 6.1.1 The Complainant operating as SAP is a global market leader company providing collaborative, inter-enterprise business solutions. The Complainant claims that it has been using its mark continuously for its products and services, not only in India but across various

countries. Due to its established reputation across various countries including India, the word SAP has been exclusively associated with the Complainant and no one else.

6.1.2 The Complainant states that it employs 103,142 people from across 145 nationalities as on March 31, 2021. The Complainant further states that it serves more than 400,000 customers in more than 180 countries. The Complainant states that in India, it has over 3000 customers, ninety-two (92%) of which are Forbes Global 2000 companies. The Complainant states of actively using its name worldwide which is apparent from its website www.sap.com. The Complainant also states that it is listed on the Frankfurt Stock Exchange and the New York Stock Exchange under ticker symbol "SAP" (as per **Annexure 2** of complaint).

6.1.3 The Complainant states that its software requires trained software professionals to load, execute, access, employ, utilize, store and display integrated end-to-end solutions derived from its software products. For the same, the Complainant has created education and training programs to meet these needs and has entered into contractual arrangements with third party software specialists known as 'Education Partners' who provide training services upon its software products. The Complainant also has authorized education training partners in India (as per **Annexure 3** of complaint).

6.1.4 The Complainant submits that any entity or company intending to provide training and education courses to third parties on use of any SAP product is required to enter into an End user License Agreement with the Complainant and any party offering such training and education without having a valid agreement with Complainant



amounts to infringement of its rights. Also, the Complainant states that it maintains a detailed software license database containing all relevant details of all SAP partners and nature of license in their favour as a particular product licensed for particular purpose cannot be used for any other purpose.

6.1.5 The Complainant states it has spend enormously on advertisement and promotion of the company. The Complainant's business activities are spread in various jurisdictions around the world and are provided on its website www.sap.com (as per **Annexure 8** of complaint). The Complainant states that its trade name 'SAP' ranks 21st in the list of Best Global Brands (2018) by Interbrand and as per Interbrand, the tradename SAP is valued at USD 28,011 million in 2020 (as per **Annexure 5** of complaint).

6.1.6 The Complainant submits that the disputed domain name is identical to and is a clear imitation of the 'SAP' trademark and has been used with an intention to misrepresent and mislead consumers that their products and services are those of Complainant. The Respondent has no legitimate interest or right in the domain name and has registered it to mislead consumers and divert web traffic to make unfair gains. Complainant submits it has neither authorized the Respondent to register nor use the alleged domain name nor to impart SAP training courses as the Complainant has not granted Respondent any Education Partner license. By such illegal use of the domain name and its trademark, Respondent has infringed the 'SAP' trademark and such use is to attract internet traffic and to make unjust monetary gain by falsely projecting an association or affiliation with the Complainant.



6.1.7 The Complainant claims that the Respondent is unauthorizedly offering SAP training courses by using unlicensed SAP software and other confidential and copyrighted training materials. The Respondent's website mentions such unauthorized SAP courses (as per **Annexure 9** of complaint) and misusing and misappropriating Complainant's trademark SAP as part of their disputed domain name www.saptraininginstituteurgaon.in (as per **Annexure 10** of complaint).

6.1.8 The Complainant submits that on coming to know about the Respondent's infringing activities through its disputed domain name, Complainant issued a cease and desist notice on Respondent on 30th November, 2020 and by the said letter requisitioned the Respondent to cease and desist from using the mark SAP in any manner such as part of domain name and in relation to its business and also to stop imparting SAP courses (as per **Annexure 11** of complaint). On failing to comply with the said letter, the Complainant again sent a cease and desist letter to Respondent on 4th March, 2021 (as per **Annexure 12** of complaint). However, the Respondent did not cease using the disputed domain name and no amicable solution was achieved to resolve the dispute.

6.2 Respondent's Defence

6.2.1 Despite the service of notice by email, the Respondent failed to reply to the notice within the stipulated time.

6.2.2 The INDRP Rules of Procedure require under Rule 8(b) that the arbitrator must ensure that each party is given a fair opportunity to present the case. Rule 8(b) reads as follows:

“The Arbitrator shall at all times treat the parties with equality and provide each one of them with a fair opportunity to present their case.”

6.2.3 Further the INDRP Rules of Procedure empowers the Arbitrator to proceed with arbitration proceedings ex-parte and decide arbitration in case any party does not comply with the stipulated time limit to file its response. Rule 12 reads as follows:

“In event any party breaches the provisions of INDRP rules and/or directions of the arbitrator, the matter can be decided ex-parte by the Arbitrator and such arbitral award shall be binding in accordance to law.”

6.2.4 In present arbitration, the Respondent has failed to file any reply to the Complaint and has not sought any further time to answer the Complainant's assertions, contentions or evidences in any manner. The Arbitrator thus finds that the Respondent has been given a fair chance to present its case. Since the Respondent has failed to reply to Notice to submit its response, Arbitration has been conducted ex-parte in accordance with Rule 12 of the INDRP rules and decided on merits ex-parte.

7. Discussion & Finding

- 7.1 The .IN Domain Name Dispute Resolution Policy in para 4 requires Complainant to establish the following three requisite conditions: -
- a) The disputed domain name is identical or confusingly similar to the trademark in which Complainant has right
 - b) The Respondent has no rights or legitimate interest in the domain name and



- c) The Respondent's domain name has been registered or is being used in bad faith

7.2 The Registrant's domain name is identical or confusingly similar to a name, trademark or service mark in which the Complainant has rights (Paragraph 4(a))

The Complainant submitted that it owns various trademark registrations using word and device mark 'SAP' in many jurisdictions throughout the world including India and has filed documents of its registered trademark ('SAP' device and word mark) in India in classes 9,16,41,42 to prove its rights in the trademark SAP (as per **Annexure 6** of complaint). Therefore, it is established that the Complainant has statutory protection in trademark in "SAP" in India. The Complainant submitted that SAP is a trademark well recognized amongst the consumers worldwide, including in India as is extensively followed on social media and has huge goodwill both offline and on internet as well.

The Arbitrator finds that the disputed domain name www.saptraininginstitutegurgaon.in is clearly identical and deceptively similar to Complainant's trademark in which the Complainant has exclusive trademark rights and the Complainant has submitted enough documentary evidence to prove its rights and ownership in SAP and SAP formative marks. A cursory glance at the disputed domain name makes it obvious that the Respondent has exactly incorporated the essential elements of the Complainant's SAP



mark and thus the disputed domain name is identical/ deceptively similar to the Complainant's mark.

As per WIPO Synopsis 3.0, while each case is judged on its own merits, in cases where a domain name incorporates the entirety of a trademark, or where at least a dominant feature of the relevant mark is recognizable in the domain name, the domain name will normally be considered confusingly similar to the mark for the purposes of UDRP standing. (*Dell Inc. v George Dell & Dell Netsolutions*, case no. D2004-0512 (WIPO Aug 24, 2004), *Busybody Inc. v Fitness Outlet Inc.* D 2000-0127 (WIPO April 22, 2000).

The disputed domain name consists of "SAP", the Complainant's trademark in entirety along with 'training' 'institute' 'Gurgaon' and the ccTLD ".in" which is likely to deceive and confuse consumers. It is well recognized that incorporating a trademark in its entirety, particularly if the mark is internationally well recognized mark, is sufficient to establish that the domain name is identical or confusingly similar to the Complainant's registered mark. (*LEGO Juris A/S v. Robert Martin*, INDRP/125(2010); *Viacom International Inc. v. MTV ALBUMS-Mega Top Video Albums Peter Miadshi*, WIPO case No. D2002-0196 (April 16, 2002); *Wal Mart Stores Inc. v. Kuchora Kal*, WIPO case no. D2006-0033 (March 10, 2006).

It has been consistently held in numerous cases that the use of descriptive words or geographic names with a trademark in a disputed domain name need not prevent a finding of confusing similarity

(*Disney Enterprises Inc. and Walt Disney Company (India) Pvt Ltd v. Registrant Id: DI_7305075*, INDRP/ 596, June 17, 2014). In addition, the Respondent represents itself as the Complainant's training partner providing courses and training for SAP products and services. Thus, there is a likelihood that consumers will be confused as to the trademark owner and origin of the services and products it provides. The Complainant has relied on *Yahoo! Inc. v. Chan*, FA162050 (Nat. Arb. Forum July 16, 2003), *PepsiCo.*, FA466022 and *SAP SE v. Mohammed Aziz Sheikh, Sapteq Global Consulting Services*, WIPO case no. D2015-0565, May 19, 2015 to support its submissions.

As the Respondent's disputed domain name incorporates important feature of Complainant's trademark SAP, is exactly same in structure and appearance with the Complainant's registered trademark, and the Respondent failed to file any reply to rebut the contention of the Complainant, the Arbitrator finds that the Respondent's domain name is identical to Complainant's registered trademark and is likely to deceive the customers.

7.3 The Registrant has no rights or legitimate interests in respect of the domain name (Para 4(b))

Under para 6 of the policy, a Respondent or a Registrant can prove rights or legitimate interest in the domain name. The Complainant has filed sufficient evidence to prove disputed domain name is identical to 'SAP' trademark, in which the Complainant enjoys substantial reputation and goodwill including web shots of its website (annexed as **Annexure 8** of complaint) and registration of trademark in India



and other jurisdictions (annexed as **Annexure 6** and **4** of complaint). The Respondent has failed to submit its reply to prove any rights or legitimate interests in the disputed domain name/trademark 'SAP.' Thus, Respondent has failed to establish legitimate interest and/or rights in the disputed domain name. Complainant has also submitted that it has not authorized Respondent to use its SAP mark and Respondent has failed to rebut the same. The burden of proof thus shifts to Respondent to demonstrate the rights or legitimate interests it holds in the mark as per WIPO Overview 3.0, section 2.1. Despite notice, the Respondent has not rebutted the contentions of the Complainant and have not produced any documents or submissions to show its legitimate interest or right in the disputed domain name.

The Complainant submitted that the Respondent is engaging in unfair commercial use of the mark SAP and disputed domain name with the sole aim to make illegal monetary benefits from unauthorised use of the goodwill and reputation of the Complainant's mark SAP. Further, the Complainant submitted that the Respondent does not have any rights or legitimate interest in the disputed domain name and it intends to make unjust and illicit commercial profits. Further, the Complainant submitted that the Respondent has no rights or legitimate interests in the disputed domain name and by registering the disputed domain name the Respondent is taking advantage of innocent customers who may or may not enquire about the authenticity of the Respondent or its relation/affiliation with the Complainant.

Complainant contends that Respondent has registered the domain name only to take unfair advantage of Complainant's global reputation and goodwill. Unlicensed and unauthorized use of domain name incorporating complainant's trademark proves respondent has no legitimate rights nor interest pursuant to ICANN Policy 4(b). Also, the Respondent is providing on its website unauthorizedly products, courses and training for Complainant's products without any license or permission whatsoever. The Complainant has relied on *Popular Enterprises, LLC v. Sung-a-Jang*, FA0610000811921 (National Arbitration Forum, Nov 16, 2006) and *SAP Systeme/ SAP India Systems v. Davinder Pal Singh Bhatia*, WIPO case no. D2001-0504, June 8, 2001 to support its submissions.

Further, the Arbitrator finds that the nature of the disputed domain name consisting of the trademark SAP and the additional words 'training', 'institute' and 'Gurgaon' carries a risk of implied affiliation, sponsorship or endorsement (WIPO Overview 3.0, Section 2.5) (*Wal-Mart Stores, Inc. v. Domains by Proxy, LLC / UFCW International Union*, WIPO Case No. D2013-1304, September 19, 2012).

It is the Respondent's responsibility to determine whether the Respondent's domain name registration infringes or violates someone else's rights. Since the Complainant's said website and trademarks were in existence and extensively used when disputed domain was registered by the Respondent on 22.12.2016 (as per **Annexure 1** of the complaint), the Respondent has to prove whether he discharged

this responsibility at the time of purchase of disputed domain name. However, despite notice Respondent failed to reply and also failed to discharge this onus.

The Respondent also failed to file any reply to show that it is making any legitimate, non-commercial or fair use of domain name without intent for commercial gains nor is likely to divert consumers or tarnish trademark by registering the disputed domain name. The Arbitrator finds that the Respondent has no rights and/or legitimate interests in the disputed domain name.

7.4 The Registrant's domain name has been registered or is being used in bad faith (Para 4(c))

For the purpose of Para 4 (c) of .IN Policy, under paragraph 7 of the policy, the Complainant is required to establish that the domain name was registered or is being used in bad faith.

The Complainant submitted that 'SAP' trademark has acquired considerable amount of goodwill worldwide including India in respect of enterprise application software, business analytics and mobile solutions. The Complainant has secured registration of the mark "SAP" (both word and device mark) in India in classes 9, 16, 41 and 42. The Respondent has produced no evidence of authorization from Complainant or justification for registering the disputed domain name. In fact, the Complainant has filed evidence to show bad faith registration of disputed domain name by filing the screenshot of the web page of the same showing its unfair use by the Respondent where



he is offering SAP courses unauthorizedly (as per **Annexure 9 and 10** of complaint). The Complainant also submits that it adopted its mark much prior to that of Respondent and that the Respondent has intentionally adopted disputed domain name www.saptraininginstitute.gurgaon.in despite prior knowledge to make unfair gains. The Complainant has relied on *The J. Jill Group Inc. v. John Zuccarini d/b/a RaveClub Berlin*, FA0205000112627 (Nat. Arb. Forum, July 1, 2002), *SAP AG v. Peifang Huang*, (WIPO case no. D2014-0928, July 28, 2014) and *Google v. Abercrombie 1*, FA0111000101579 (Nat. Ar. Forum, December 10, 2001) to prove bad faith registration.

Further, it is evident from the evidence filed by Complainant that Respondent has used the disputed domain name to intentionally attract the consumers to its website by creating a likelihood of confusion with the Complainant's 'SAP' trademark as to source, sponsorship, affiliation or association. The Respondent offered unauthorizedly training and products of complainant on website using the disputed domain name. Use of a domain name to impersonate the trademark owner and/or misrepresent an association/affiliation without authorization is not legitimate and cannot establish legitimate rights as per WIPO Overview 3.0, Section 2.5.1 (*Ford Motor Company v. Myke Towers*, WIPO case no. D2-21-0081, February 17, 2021).

For the aforesaid reasons, the Arbitrator in the present case finds bad faith in the registration and use of the disputed domain name. (Ref.

Virgin Enterprises Limited v. Syed Hussain, WIPO Case no. D2012-2395, January 28, 2013).

Complainant provided sufficient evidence showing widespread use, goodwill and trademark registration of the 'SAP' mark in various countries which long predates Respondent's registration of the disputed domain name which incorporates completely the registered trademark SAP of the Complainant. WIPO Overview 3.0 notes in Section 3.14 *"panels have consistently found that the mere registration of a domain name that is identical or confusingly similar (particularly domain names comprising typos or incorporating the mark plus a descriptive term) to a famous or widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith"*. The same principle is relied on in *Adobe Inc. v. Amin Mohammad Salehi*, Uranos, case no. DIR2020-0006, June 30, 2020.

The Arbitrator finds that the Respondent has registered the disputed domain name to prevent Complainant from registering or using the mark. It is evident from the evidence filed with the complaint that Respondent has no connection with trademark 'SAP' and his sole aim is to gain illegal monetary benefit from the goodwill and reputation of SAP by misleading the consumers which amounts to bad faith registration under .IN policy.

Moreover, it is settled law that the incorporation of a well-known trademark into a domain name by a registrant having no plausible explanation for doing so may be, in and of itself, an indication of bad



faith. (*Microsoft Corporation vs. Montrose Corporation*, (WIPO Case No. D2000-1568, January 25, 2001). In present case, the Respondent failed to file any response to the contention and submission of the Complainant. It is also settled principle that registration of a domain name with the intention to create confusion in the mind of internet users and attract internet traffic based on the goodwill associated with the trademark is considered bad faith registration and use (*PepsiCo Ins. Vs. Wang Shaung*, INDRP case no.400, December 13, 2012).

For the aforesaid reasons, the Arbitrator finds the disputed domain name has been registered and used in bad faith under the .IN Policy.

8. DECISION

On the basis of the abovesaid findings the Sole Arbitrator finds that:

- a) The Complainant has successfully established three grounds required under the policy to succeed in these proceedings.
- b) Respondent has failed to rebut averments, contentions and submissions of the Complainant.

The Arbitrator directs the .IN Registry of NIXI to transfer the domain name "www.saptraininginstitute.gurgaon.in" to the Complainant.

The Award is passed on this 25th August, 2021

Place: Noida



Dr. Karnika Seth
Sole Arbitrator