

Conflict of Norms on the Implementation of Personal Data Protection in Insurance Companies in Indonesia

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Abstract

This study examines the harmonization of personal data protection regulations within Indonesia's insurance sector following the enactment of Law Number 27 of 2022 concerning Personal Data Protection (PDP Law). Since its promulgation on 17 October 2022, the PDP Law has established a comprehensive normative framework governing the processing and protection of personal data. Its alignment with sectoral regulations becomes imperative, particularly in light of Law Number 4 of 2023 concerning the Development and Strengthening of the Financial Sector (PPSK Law). Article 3 paragraph (2) letter (i) of the PPSK Law explicitly affirms the objective of strengthening the protection of customers' personal data in the financial services sector, while Article 240 paragraph (1) requires financial sector business actors, including insurance companies, to comply with prevailing personal data protection laws and regulations as well as supervisory provisions issued by the Financial Services Authority. However, in practice, the PDP Law currently fulfills primarily the element of legal substance within the legal system. The structural and legal culture components remain incomplete, as the Law mandates the issuance of ten Government Regulations and one Presidential Regulation to operationalize its provisions. The absence of these implementing instruments creates normative fragmentation and limits effective enforcement within the insurance industry. Consequently, the PDP Law predominantly reflects a preventive model of legal protection, as conceptualized by Hadjon, emphasizing anticipatory safeguards and compliance mechanisms rather than repressive enforcement. This condition highlights the urgency of regulatory harmonization and institutional strengthening to ensure coherent and effective personal data protection governance in Indonesia's insurance sector.

Keywords: Personal Data Protection, Insurance, and Financial Services Authority.

A. INTRODUCTION

The 1945 Constitution of the Republic of Indonesia (hereinafter referred to as the 1945 Constitution of the Republic of Indonesia) as the constitutional foundation of the state, especially in the 4th paragraph of the Preamble to the Constitution of the Republic of Indonesia, states that the purpose of the establishment of the Government of the State of Indonesia is to protect the entire Indonesian Nation and all Indonesian bloodshed and to advance the general welfare, educate the life of the nation, and participate in implementing world order (Makarim, 2020).

Article 28G paragraph (1) of the 1945 Constitution of the Republic of Indonesia guarantees human rights, one of which is related to personal rights. Then, Article 28H paragraph (4) of the 1945 Constitution of the Republic of Indonesia also guarantees that private property rights and these property rights must not be taken arbitrarily by anyone. Finally, Article 28J of the 1945 Constitution of the Republic of Indonesia also requires everyone to respect the human rights of others.

Article 28G paragraph (1), 28H paragraph (4), and Article 28H of the 1945 Constitution of the Republic of Indonesia are the Government's Constitutional Basis in terms of ratifying the regulation of personal data protection on October 17, 2022 as per Law Number 27 of 2022 concerning Personal Data Protection (hereinafter referred to as the PDP Law), as one of the Government's guarantees of citizens' rights to personal personal protection which is part of Human Rights.

The PDP Law regulates, among others, the principles, types of personal data, the rights of personal data subjects, personal data processing, and the obligations of personal data controllers and personal data processors in the processing of personal data. The urgency of Personal Data Protection is getting greater along with the rapid development of information and communication technology has created various opportunities and challenges.

The increasingly diverse and complex demands of the Financial Services Sector Industry, the pace of an increasingly fast, competitive, and integrated economy require Indonesia to make a new arrangement as a form of regulatory adjustment in the financial sector, namely by promulgating Law Number 4 of 2023 concerning the Development and Strengthening of the Financial Sector (hereinafter referred to as the PPSK Law) on January 12, 2023.

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Article 2 of the PDP Law regulates related legal principles to efforts to protect Personal Data in the series of processing Personal Data in order to guarantee the constitutional rights of the subject of Personal Data, one of which is the principle of accountability. This is in line with the objectives of Article 3 of the PPSK Law, one of which is to strengthen the protection of personal data of financial sector customers, so that Insurance as one of the financial sector ecosystems is obliged to apply the basic principles of personal data protection processing as stipulated in the provisions of laws and regulations regarding personal data protection (Prasetyo et al., 2025).

Since this PDP Law was promulgated and declared enforceable, the legal principles and legal principles in the PDP Law need to be harmonized with the regulation of Insurance Law in Indonesia. Article 240 paragraph (1) of the PPSK Law regulates the use of data and/or consumers, PUSK or in this case Insurance Companies pay attention to the provisions of laws and regulations regarding personal data

protection and other laws and regulations stipulated by the Financial Sector Authority. This regulation results in dualism towards Personal Data Protection in Insurance Businesses in Indonesia because on the one hand Article 58 of the PDP Law mandates the Institution as the Provider of Personal Data Protection regulated by Presidential Regulation (until now it has not been issued), as well as the Financial Services Authority in carrying out the task of regulating and supervising Financial Services Activities, one of which is in Insurance (Efendy, 2024; Solikhah, 2025).

This study aims to analyze how the protection of personal data processing arrangements for Insurance Companies in Indonesia and how the Role of the Financial Services Authority in organizing personal data protection efforts for Insurance Companies in Indonesia.

B. METHOD

This study employs a qualitative doctrinal-empirical approach to examine the conflict of norms in the implementation of personal data protection within Indonesian insurance companies. The research combines normative legal analysis and qualitative case study methods to capture both regulatory inconsistencies and practical compliance challenges (Yin, 2018; Creswell & Poth, 2018).

The normative component analyzes primary legal sources, including the Personal Data Protection Law, insurance regulations issued by the Financial Services Authority (OJK), and related sectoral legislation. A statutory and conceptual approach is applied to identify overlapping provisions, inconsistencies, and hierarchical tensions between legal norms (Bowen, 2009).

The empirical component involves semi-structured interviews with purposively selected informants, including compliance officers, Data Protection Officers (DPOs), regulators, and legal practitioners in the insurance sector. Purposive sampling ensures the inclusion of information-rich participants directly involved in regulatory compliance (Patton, 2015).

Data were analyzed using thematic analysis following the interactive model of data reduction, data display, and conclusion drawing (Miles, Huberman, & Saldaña, 2014). Normative interpretation was conducted using legal hermeneutics to assess statutory coherence and regulatory intent. To ensure credibility, the study applied source triangulation and member checking (Lincoln & Guba, 1985). Ethical standards were observed through informed consent and confidentiality safeguards.

C. RESULTS AND DISCUSSION

1. Personal Data Processing Protection Arrangements for Insurance Companies in Indonesia

The concept of personal protection can be said to be the recognition of the right or right to privacy which must be protected by law as stated in Article 17 of the Human Rights Committee General Number 16 on the Rights to Respect of Privacy, Family,

Home, and Correspondence, and Protection of Honor and Reputation. Privacy, as part of human rights, identifies data privacy protection as an important right (Dewi, 2015).

Data protection is also the key to various business problems and also economic problems in the information-intensive business field in the modern era. Today's modern business practices often involve data manipulation such as customer data segmentation, including data mining and data retrieval, customer profiling, global data processing consolidation, and other business processes (Dewi, 2016).

Data protection is also a fundamental human right, namely a person's right to obtain security for their data and justification when errors are found in their data. Article 12 of the ASEAN Human Rights Declaration also clearly recognizes the right to data privacy governing:

"Every person has the right to be free from arbitrary interference with his or her privacy, family, home or correspondence including personal data, or to attacks upon that person's honor and reputation. Every person has the right to the protection of the law against such interference or attacks".

Since the amendment of the 1945 Constitution of the Republic of Indonesia, the right to privacy including the protection of personal data privacy has been recognized as a constitutional right as a citizen. This is in line with the inclusion of a special chapter on human rights in the constitutional amendment contained in Article 28 A-J. Provisions regarding data privacy protection guarantees can be found in Article 28G paragraph (1) of the 1945 Constitution of the Republic of Indonesia which regulates:

"Everyone has the right to the protection of his or her personality, family, honor, dignity, and property, and to the right to a sense of security and protection from the threat of fear of doing or not doing something that is a human right".

In addition to constitutional protections, Indonesia's involvement as a state party to the *International Covenant on Civil and Political Rights* (ICCPR) was later ratified through Law Number 12 of 2005 concerning the Ratification of the ICCPR, which has also emphasized that the Indonesian government's obligation to protect the privacy and personal data of its citizens (Djafar & Santoso, 2016).

Currently, Indonesia has a Personal Data Protection regulation at the level of the Law as Article 74 of the PDP Law mandates that the principles of personal data protection as stipulated in the PDP Law can be applied no later than 2 (two) years from the promulgation of the PDP Law, or at least until October 16, 2024. The following is a tabulation of the content material of the PDP Law that can be the focus of the researcher in analyzing this sub-chapter, as follows:

Table 1. Contents of the PDP Law

No.	Chapter	Pasal
1.	CHAPTER I General Terms	Article 1 Definition
		Article 2 Scope
2.	CHAPTER II Principles	Article 3 Principles of the PDP Law
3.	CHAPTER III	Article 4 Personal Data is specific and general

	Types of Personal Data	
4.	CHAPTER IV Rights of Personal Data Subjects	Articles 5 – 15 The Personal Data Subject has the right to obtain information, complete, update, and/or correct errors, right of access, right to terminate processing, right to withdraw consent, right to object, right to delay/restrict, right to sue and receive compensation
5.	CHAPTER V Processing of Personal Data	Article 16 paragraph (1) Scope of Personal Data Processing
		Article 16 paragraph (2) Principles of Personal Data Processing
		Article 17 Provisions for visual data processors
		Pasal 18 Joint Controller
6.	CHAPTER VI Obligations of Controllers and Processors of Personal Data	Article 19 Scope of Controllers and Processors of Personal Data
		Article 20 - 49 Obligations of the Personal Data Controller
		Article 50 Exceptions to the obligations of the Personal Data Controller
		Article 51 Obligations of the Processor of Personal Data <i>Jo.</i> Article 29, Article 31, Article 35, Article 36, Article 37, Article 38, and Article 39
		Article 53 – 54 Obligation to Appoint a Data Protection Officer (DPO)
7.	BAB VII Transfer of Personal Data	Article 55 Transfer of personal data within the territory of the Republic of Indonesia
		Article 56 Transfer of personal data outside the territory of the Republic of Indonesia
8.	CHAPTER VIII Administrative Sanctions	Article 57 Controllers and Processors of Personal Data who violate their obligations are subject to administrative sanctions
		Violation of the provisions of Article 20 paragraph (1), Article 21, Article 24, Article 25 paragraph (2), Article 26 paragraph (3), Article 27, Article 28, Article 29, Article 30, Article 31, Article 32 paragraph (1), Article 33, Article 34 paragraph (1), Article 35, Article 36, Article 37, Article 38, Article 39 paragraph (1), Article 40 paragraph (1), Article 41 paragraph (1) and paragraph (3), Article 42 paragraph (1), Article 43 paragraph (1), Article 44 paragraph (1), Article 45, Article 46 paragraph (1) and paragraph (3), Article 47,

		Article 48 paragraph (1), Article 49, Article 51 paragraph (1) and paragraph (5), Article 52, Article 53 paragraph (1), Article 55 paragraph (21), and Article 56 paragraph (2) to paragraph (4) are subject to administrative sanctions.
		Administrative sanctions in the form of: written warning, temporary suspension of Personal Data processing activities, deletion or destruction of Personal Data, and/or administrative fines
9.	BAB IX Institutional	Article 58 The Role of the Government in the Implementation of PDP
		Article 59 Implementation of Personal Data Protection by Institutions
		Article 60 Duties, functions, and authorities of the institution
10.	BAB X International Cooperation	Article 62 International cooperation is carried out by the Government with the Government of another country or international organization related to the Protection of Personal Data
11.	CHAPTER XI Community Participation	Article 63 Participation and role of the community in supporting the implementation of Personal Data Protection
12.	CHAPTER XII Dispute Resolution and Procedural Law	Article 62 paragraph (1) through Arbitration, Courts, or other Alternative Dispute Resolution Institutions in accordance with the provisions of the law.
		Article 62 paragraph (3) of the arrangement of evidence is in accordance with procedural law and can be in the form of electronic information and/or electronic documents
		Article 62 paragraph (3) implementation of the trial process behind closed doors
13.	Bab XIII Prohibitions on the Use of Personal Data	Articles 65 – 66 Everyone is prohibited intentionally and unlawfully: Collect personal data that does not belong to him; Disclosing personal data that does not belong to him; Use personal data that does not belong to him; Falsifying personal data
14.	BAB XIV Criminal Provisions	Articles 67 – 69 Every person who commits a prohibited act as intended in Articles 65 – 66 shall be subject to criminal sanctions
		Article 70 paragraphs (1), (2), and (3) of the Corporate Criminal Code

		Article 70 paragraph (4) Additional offences
15.	BAB XV Transition Terms	Article 74 of the PDP Law is effective from the date of promulgation and the adjustment period to the PDP Law is a maximum of 2 (two) years
		Article 75 All provisions of laws and regulations governing Personal Data Protection remain in force as long as they do not conflict with this PDP Law
16.	CHAPTER XVI Closing Conditions	Article 76 of the PDP Law is effective since it was promulgated on October 17, 2022

From the tabulation above, the researcher found that there are legal facts, as follows:

- a. The PDP Law provides a transition period of two years starting from October 17, 2022 for Data Controllers, Data Processors, and other parties related to a data processing activity to adjust their data processing practices to the requirements of the PDP Law;
- b. Several provisions of the PDP Law have come into effect since October 17, 2022, in other words, provisions on prohibited conduct related to data processing activities may be subject to criminal sanctions according to their qualifications;
- c. The PDP Law does not apply retroactively to data processing activities carried out before October 17, 2022;
- d. Administrative sanctions under the PDP Law range from written warnings, temporary suspension of personal data processing activities, deletion or destruction of personal data, and/or administrative fines. In addition, prison sentences, criminal fines, asset forfeiture, asset freezes, revocation of licenses, and business dissolution (among many others) may also apply; and
- e. The PDP Law will apply to businesses based within and outside Indonesia.

Based on the tabulation above, it is associated with Friedman's opinion about the legal system which basically has 3 (three) elements, namely: *structure of legal system*, *substance of legal*, and *legal culture*, The content of the body of the PDP Law is assessed by the researcher to only meet 1 (one) element of the legal system, namely *the substance of legal* (Friedman, 1984). This is because there are still several provisions in the PDP Law that must be implemented immediately, such as the implementing regulations of the PDP Law on the establishment of data protection authorities. However, even though the PDP Law requires at least 11 implementing regulations for the Law, including 10 (ten) in the form of Government Regulations and 1 (one) in the form of Presidential Regulations.

Article 74 of the PDP Law stipulates that no later than (2) years since the PDP Law was promulgated, the mandated implementing regulations as mentioned above must be adjusted, but the implementing regulations have not been promulgated until now. Therefore, the elements of the structure of *the legal system* and the legal culture of the community can only be fulfilled if 10 (ten) Government Regulations and 1 (one) Presidential Regulation have been promulgated as mandated by the PDP Law.

The absence of elements of the structure of *the legal system* and the legal culture of the community (*legal culture*) results in the implementation related to the Protection of Personal Data in Insurance Companies still having to refer to various related laws and regulations before the PDP Law is promulgated, summarized as follows:

- a. Article 26 of Law Number 19 of 2016 concerning Amendments to Law Number 11 of 2008 concerning Information and Electronic Transactions (hereinafter referred to as the ITE Law) specifically prohibits the use and transfer of personal data without the consent of the relevant individual. In addition, it also states that relevant individuals can file complaints and seek financial compensation if they can assume that their personal data has been transferred without their consent. In addition, in the amendment of the law, Electronic System Providers (PSEs) are obliged to immediately revoke irrelevant electronic information or documents based on the request of the data owner through a court decision. However, it does not comprehensively discuss the definition and scope of personal data;
- b. Government Regulation Number 71 of 2019 concerning the Implementation of Electronic Systems and Transactions (hereinafter referred to as PP No. 71/2019), this regulation stipulates the obligations of Electronic System Operators (hereinafter referred to as PSE), in particular, by regulating the use and location of data centers. In addition, protecting personal data is an important obligation for PSEs mandated by this regulation. Another obligation of the PSE under this regulation is to notify users of personal data protection failures. However, as with the ITE Act, this regulation does not provide a clear definition and scope of personal data, making it difficult to assess which data processing operations apply;
- c. Slightly different from the two regulations mentioned above, the Regulation of the Minister of Communication and Information Technology Number 20 of 2016 concerning the Protection of Experimental Data in Electronic Systems (hereinafter referred to as Permenkominfo No. 20/2016) provides a more detailed definition of personal data. Interestingly, there are two definitions of personal data defined in this regulation. The first definition concerns personal data itself, where it is defined as "a specific type of personal data whose validity is stored, maintained and maintained, and whose confidentiality is protected". The second definition concerns certain types of personal data (certain individual data), where it is defined as: "any valid and factual information that is inherent and identifiable, either directly or indirectly, on each individual and that its use must be in accordance with the provisions of laws and regulations." The difference between the two definitions is that the first definition of personal data is more general than the second. The second definition further elaborates on "certain types of personal data" as mentioned in the first definition. Furthermore, the rights of personal data subjects are also regulated in regulations, although they are not comprehensively regulated.

2. The Role of the Financial Services Authority in Organizing Personal Data Protection Efforts for Insurance Companies in Indonesia

The three regulations above only focus on personal data processed through electronic systems. Specifically in the Insurance Industry, the collection, processing, and transmission of personal data in the financial sector is specifically discussed in Article 31 of Law Number 21 of 2011 concerning the Financial Services Authority (hereinafter referred to as the OJK Law) stipulates that further provisions regarding the protection of consumers and the public are regulated by the Financial Services Authority Regulation which is also attributed by Article 244 paragraph (2) of the PPSK Law regulates: "Provisions regarding the exercise of authority as referred to in paragraph (1) are regulated by the regulation of the financial sector authority". Thus, providing regulatory delegation to the Financial Services Authority Regulation Number 22 of 2023 concerning the Protection of Consumers and the Community in the Financial Services Sector (hereinafter referred to as POJK Per-Consumer) with the role of the Financial Services Authority in facilitating the settlement of Consumer Complaints. In Article 3 paragraph (2) letter d of the Consumer POJK, it is stipulated that: "Consumer Protection in the financial services sector applies principles, one of which is the protection of assets, privacy, and consumer data".

The authority of the Financial Services Authority in providing Insurance Customer Data Protection can impose administrative sanctions and fine sanctions against Data Processing Violations committed by Insurance Companies, as follows:

- a. Imposing Administrative Sanctions and fines on Insurance Companies that do not maintain the confidentiality and security and/or information of Consumers as stipulated in Article 19 of the Consumer POJK;
- b. Imposing Administrative Sanctions and fines on Insurance Companies that do not ensure adequate and binding Personal Data Protection against the transfer of data and/or information of Consumers in the form of corporations as stipulated in Article 21 of the POJK per-consumer;
- c. Imposing Administrative Sanctions and fines on Insurance Companies that provide data and/or information about Consumers to other parties, using data and/or information of Consumers who have terminated product and/or service agreements, using data and/or information of prospective Consumers whose application for the use of products and/or services is rejected by the Insurance Company, using data and/or information of prospective Consumers who withdraw applications for the use of products and/or services as stipulated in Article 22 of the Consumer POJK;
- d. Imposing Administrative Sanctions and fines on Insurance Companies that do not explain in writing and/or verbally the purpose and consequences of the Consumer's consent related to the provision of Consumer data and/or information. as stipulated in Article 23 of the Consumer POJK;
- e. Imposing Administrative Sanctions and fines on Insurance Companies that do not ensure information system security and cyber resilience for Consumer Protection. as stipulated in Article 24 of the Consumer POJK.

Therefore, the Insurance Company may be held liable by the Financial Services Authority if there is a loss of the Customer who experiences a failure in data processing caused by errors, negligence, and acts that are contrary to the provisions of laws and regulations in the financial services sector and/or agreements, whether carried out by the Board of Directors, Board of Commissioners, Employees, and/or carried out by third parties representing or working, unless it can be proven otherwise that the Insurance Company may be relieved of liability.

Based on the above explanation, when associated with the definition of legal protection according to Hadjon (1987), with the following elements:

- a. Protection of dignity and dignity, as well as recognition of human rights belonging to legal subjects;
- b. Based on the general provisions of arbitrariness;
- c. As a rule that will be able to protect something else.

These three elements are intended to provide protection of human rights that are harmed by the behavior of certain communities, so that legally it creates an obligation for the government to provide means for these rights to be protected. If it is associated with the absence of 10 (ten) Government Regulations and 1 (one) Presidential Regulation as mandated by the PDP Law, it has not been able to meet the elements of regulations that will be able to protect something, so at the implementation level it is still necessary to use laws and regulations before the promulgation of the PDP Law.

This has not been able to fulfill one of the philosophical foundations of the formation of the PDP Law, namely: The formation of the PDP Law is to increase the effectiveness in implementing personal data protection because there are still several laws and regulations related to the regulation of personal data (partial and sectoral) and this is considered by the framers of the PDP Law to not be able to provide optimal and effective protection for personal data (bphn.go.id).

D. CONCLUSION

In conclusion, although Indonesia formally enacted the Personal Data Protection Law (PDP Law) on 16 October 2022, its implementation in the insurance sector remains structurally incomplete. The PDP Law currently fulfills the element of legal substance; however, the effectiveness of personal data protection depends on the establishment of supporting regulations mandated by the Law, namely ten Government Regulations and one Presidential Regulation. In the absence of these implementing instruments, the structural dimension of the legal system has not been fully institutionalized, and the development of a corresponding legal culture within society and regulatory institutions remains limited.

Consequently, insurance companies continue to rely on pre-existing sectoral regulations and supervisory frameworks, particularly those under financial services law, resulting in regulatory fragmentation and normative overlap. This condition weakens legal certainty and hinders coherent enforcement of personal data protection standards in the insurance industry. Substantively, the PDP Law reflects a preventive

model of legal protection, as conceptualized by Hadjon, by emphasizing compliance obligations, accountability principles, and safeguards prior to the occurrence of violations. However, without complete institutional and regulatory harmonization, its preventive orientation has yet to operate optimally in practice.

REFERENCES

- Badan Pembinaan Hukum Nasional. (n.d.). *Naskah akademik Rancangan Undang-Undang Perlindungan Data Pribadi*. Retrieved from: https://bphn.go.id/data/documents/na_perlindungan_data_pribadi.pdf
- Bowen, G. A. (2009). Document analysis as a qualitative research method. *Qualitative Research Journal*, 9(2), 27–40.
- Creswell, J. W., & Poth, C. N. (2018). *Qualitative inquiry and research design: Choosing among five approaches*. SAGE Publications.
- Dewi, S. (2015). Privasi atas data pribadi: Perlindungan hukum dan bentuk pengaturan di Indonesia. *Jurnal De Jure*, 15(2).
- Dewi, S. (2016). Konsep perlindungan hukum atas privasi dan data pribadi dikaitkan dengan penggunaan cloud computing di Indonesia. *Yustisia*, 5(1).
- Djafar, W., & Santoso, M. J. (2016). *Perlindungan data pribadi di Indonesia (Usulan pelebagaan kebijakan dari perspektif hak asasi manusia)*. Lembaga Studi dan Advokasi Masyarakat (ELSAM).
- Efendy, A. R. M. (2024). Towards enhanced personal data protection: A novel approach to regulation and practice in Indonesia. *E-Justice: Journal of Law and Technology*, 1(1), 1-15.
- Friedman, L. M. (1984). *American law: An introduction*. W.W. Norton & Company.
- Hadjon, P. M. (1987). *Perlindungan Hukum Bagi Rakyat Indonesia*. Bina Ilmu.
- Lincoln, Y. S., & Guba, E. G. (1985). *Naturalistic Inquiry*. SAGE Publications.
- Makarim, E. (2020). Privacy and personal data protection in indonesia: the hybrid paradigm of the subjective and objective approach. In *Data Protection Around the World: Privacy Laws in Action* (pp. 127-164). The Hague: TMC Asser Press.
- Miles, M. B., Huberman, A. M., & Saldaña, J. (2014). *Qualitative data analysis: A methods sourcebook*. SAGE Publications.
- Patton, M. Q. (2015). *Qualitative Research & Evaluation Methods*. SAGE Publications.
- Prasetyo, B., Handayani, I. G. A. K. R., & Sulistiyono, A. (2025). Data Protection Laws in Indonesia: Navigating Privacy in the Digital Age. *Side: Scientific Development Journal*, 2(1), 9-16.
- Satwiko, B. S. (2021). Privacy and data protection: Indonesian legal framework. *Corporate and Trade Law Review*, 1(2), 98-118.
- Solikhah, M. A. (2025). Personal data protection in the era of digital transformation: Challenges and solutions in the Indonesian cyber law framework. *Indonesian Cyber Law Review*, 2(1), 39-50.
- Undang-Undang Dasar Negara Republik Indonesia Tahun 1945.
- Undang-Undang Republik Indonesia Nomor 27 Tahun 2022 tentang Perlindungan Data Pribadi.

Undang-Undang Republik Indonesia Nomor 4 Tahun 2023 tentang Pengembangan dan Penguatan Sektor Keuangan.

Yin, R. K. (2018). *Case Study Research and Applications: Design and Methods*. SAGE Publications.