

## The Law Of Personal Data Protection In The Pandemic Time Covid-19 On Electronic System

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#### Abstract

*(Write the abstract in English. The Abstract should be informative and completely self-explanatory, provide a clear statement of the problem, explain the reason why this study is important to do, explain the research method used, the proposed approach, and point out major findings and conclusions. The Abstract should be 100 to 250 words in length and in italicized format. The abstract should be written in the past tense. Standard nomenclature should be used and abbreviations should be avoided. No literature should be cited, use TNR 11 pt, single space, align left for the beginning of the paragraph, and the word "Abstract" is indented. Beside that, the keyword list provides the opportunity to add keywords, used by the indexing and abstracting services, in addition to those already present in the title. Judicious use of keywords may increase the ease with which interested parties can locate our article).*



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#### Abstrak

*(Tulis abstrak dalam bahasa Indonesia yang baik dan benar. Abstrak harus informatif dan jelas. Abstrak terdiri dari pengantar/pembuka, masalah dan alasan mengapa penelitian ini penting untuk dilakukan, tujuan utama penelitian dalam memberikan pernyataan masalah, teori atau konsep yang digunakan, metode penelitian yang digunakan, penjelasan sekilas tentang objek penelitian, dan hasil singkat temuan penelitian. Panjang abstrak ditulis 150 hingga 250 kata dan ditulis dengan cetak miring).*

## INTRODUCTION

The Covid-19 pandemic is a global disaster that is rapidly spreading, causing health and economic crises around the world. The World Health Organization (WHO) has declared Covid-19 a health pandemic because it has attacked various countries in the world at almost the same time. President of the Republic of Indonesia, Joko Widodo has determined by Presidential Decree No. 12 of 2020 on the Determination of National Non-Natural Disasters the Spread of Corona Virus Disease 2019 (Covid-19), on April 13, 2020.

The Covid-19 pandemic has forced people's way of doing activities, in this case the use of digital devices. Data from Analytics Data Advertising (ADA) shows a 50% decrease in community activity in shopping centers (malls), this is also followed by a 300% increase in online application usage. This increase began since the enactment of the social distancing policy that has been announced on March 15. Supported also by the enactment of policies to work from home, this requires the public to conduct collaboration, communication and meeting activities digitally<sup>1</sup>.

Internet usage during the Covid-19 pandemic has presented a new era known as New Normal, where all forms of activity, such as financial transactions turn to digital. The emergence of this situation has had logical consequences for the increasing threat of cyberattacks that infiltrate every social activity through Information and Communication Technology<sup>2</sup>.

Increased public activity in utilizing the internet is followed by the risk of misuse of personal data. According to the complaint data of the Indonesian Consumer Institute Foundation (YLKI) in 2019, there were 96 complaints related to online loan persons. A total of 54 of these occurred on illegal online loans. These complaints include complaints about high interest rates that are not in accordance with the rules, but also related to access to consumer data used to terrorize relatives during the debt collection process<sup>3</sup>.

Personal Data Protection is urgent as an effort to provide protection to e-commerce consumers. The use of personal data in e-commerce service applications is often misused and accessed for purposes outside of platform provider transactions. Frequent abuse related to financial technology (fintech) companies, consumer data disseminated and sold without the permission of consumers<sup>4</sup>. With the leakage of illegally traded data on the dark web not only harms users, but also harms the credibility of the platform that has the potential to harm businesses. The threat to privacy protection is becoming more apparent with the absence of comprehensive personal data protection laws.

Currently, the issue of personal data protection is governed by 32 laws and derivative regulations. This causes the implementation and supervision related to this issue spread in various ministries / institutions. The misuse of personal data in e-commerce is at least regulated by the Telecommunications Act, the Information and Electronic Transactions Act (ITE), the Consumer Protection Act, the Trade Act, and government regulations and ministerial regulations, so that indirectly, the affairs of personal data protection are the authority of the Ministry of Commerce and the Ministry of Communication and Informatics. Without strong coordination from the ministry, the implementation and supervision of

<sup>1</sup> Ira Aprilianti, National Consumer Day, Personal Data Protection in the Midst of the Covid-19 Pandemic, Center for Indonesian Policy Studies, p. 1. <https://referensi.elsam.or.id/2020/04/hari-konsumen-nasional-perlindungan-data-pribadi-di-tengah-pandemi-covid-19/> accessed March 10, 2021

<sup>2</sup> Ratnadi Hendra Wicaksana, Adis Imam Munandar and Palupi Lindiasari Samputra, Personal Data Protection Study with Narrative Policy Framework: Cyber Attack Cases during the Covid-19 Pandemic, Iptek-KOM Journal, Volume 22 Number 2, December 2020, p. 144

<sup>3</sup> *Ibid*

<sup>4</sup> <https://www.cips-indonesia.org/post/siaran-pers-kebocoran-data-ingatkan-pentingnya-legislasi-ruu-perlindungan-data-pribadi> accessed 10 March 2021

consumer protection will be difficult to ascertain.

The need for comprehensive personal data protection rules has not been accompanied by the growing public awareness in protecting personal data. Although mastel and APJII survey in 2017 mentioned, 79% of survey respondents objected to personal data being transferred without permission. Even 98% of them want the Personal Data Protection Act (UU PDP) to be established immediately. But practice on the field shows little such concern<sup>5</sup>.

The public generally has not placed personal data as part of the property that must be protected. This can be tracked from the number of posts containing personal data content, both on a number of social media platforms, and in various social networking groups. In addition, when going to use a number of electronic system platforms (e-commerce, onlinetransportation, fintech, etc.) generally users also do not fully understand the privacy policy, terms and conditions of service of each application, especially related to the use of personal data<sup>6</sup>. The absence of the Personal Data Protection Act is the main reason they have not been aligned with data protection rules. In addition, it is also a matter of low understanding of the company regarding the concept of privacy and consumer data protection.

## METHODOLOGY

Research method is a way of achieving the objectives of a research. The right method will be easy to reveal the facts or truth of a study so that it can be accounted for. Scientific research method is a mechanism used in finding a scientific burden<sup>7</sup>.

The research method used is normative juridical research (normative legal research method). Normative juridical research method is literature law research conducted by researching library materials or mere secondary data<sup>8</sup>.

## RESULTS AND DISCUSSION

### The Concept of Privacy and Personal Data Legal Protection

Advances in communication technology based on computer technology have brought people's lives to grow very rapidly. This makes it easier for people to be facilitated by the technology<sup>9</sup>. The thing that makes it easier to use this computer technology with the internet. The use of the internet in every joint of people's lives has made life easier, but it also brings problems in the field of law. The problem that arises in the field of law is the protection of personal data<sup>10</sup>.

A concept of personal data protection is the right of an individual to determine whether or not he or she will join the community and then share or exchange data information between them and the right to determine the conditions that must be met to do such matters<sup>11</sup>. This concept of personal data protection law covers safeguarding the protection

<sup>5</sup><https://fh.unpad.ac.id/urgensi-perlindungan-data-pribadi-dalam-menjamin-hak-privasi-sebuah-telaah-ruu-perlindungan-data-pribadi/> accessed 11 March 2021

<sup>6</sup> Wahyudi Djafar, Personal Data Protection Law in Indonesia: Landscape, Urgency and Need for Renewal, <https://law.ugm.ac.id/wp-content/uploads/sites/1043/2019/08/Hukum-Perlindungan-Data-Pribadi-di-Indonesia-Wahyudi-Djafar.pdf>, accessed 11 March 2021

<sup>7</sup> Moh. Natsir, Research Method, Ghalia Indonesia, Bogor, 1995, p. 36

<sup>8</sup> Bambang Sunggono, Legal Research Methodology, Raja Grafindo Persada, Jakarta 2003, p. 13

<sup>9</sup> Nani Widya Sari, CyberCrime in the Development of Computer-Based Information Technology, Jurnal Surya Kencana Dua: Dynamics of Legal and Justice Issues, Volume 5 Number 2, 2018, p. 578.

<sup>10</sup> Ririn Aswandi, Putri Rofifah Nabilah Muchsin, Muhammad Sultan, Data protection and Personal Information through Indonesian data protection system (IDPS), Legislative Journal (Solative and Innovative Student Ideas Sheet), Volume 3 Number 2, June 2020, p. 171

<sup>11</sup> Sinta Dewi, The Concept of Legal Protection of Privacy and Personal Data is associated with the Use of Cloud Computing in Indonesia, Yustisia Journal, Volume 5 No. 1, January-April 2016, p. 25

of the security of personal data and allowing its use by others as long as it complies with the specified terms and conditions<sup>12</sup>.

The concept of privacy is universal and regulated in several countries both in the form of legislation and unwritten rules that exist in society (moral). In 1980, Samuel Warren and Louis Brandeis became the first originators of the concept of privacy rights. The Harvard Law Review published an essay titled "The Right to Privacy", written by Samuel and Louis. They revealed that recognition of individual rights "right to be let alone" is one of the issues of Human Rights, so Warren conveyed his idea that privacy is the right of every individual who needs to get protection to the judge. The protection of personal data is important because it is essential regarding one's self-esteem and freedom of expression<sup>13</sup>. Warren and Brandies' opinion was responded by Berzanson that the right to privacy of personal data is used as a legal concept in an effort to respect a person's right to enjoy his or her life in accordance with his/her rights<sup>14</sup>. Protection of privacy of personal data if not protected then when the dissemination of a person's personal information can cause harm both material and immaterial<sup>15</sup>.

Data protection is basically specifically related to privacy, it can be applied in terms of broader than privacy. Data protection is part of privacy which is a form of confidentiality or the right to close information or the right to restrict individual access to control over one's self-information. Data protection is closely related to the right to respect for personal and family life<sup>16</sup>.

Protection of personal data, there are several legal subjects that must be regulated, among them<sup>17</sup>:

#### **(1) Personal Data Manager**

Activities or sequences of some activities carried out on personal data, either using data processing tools automatically or by manual means, in a structured way using a data storage system, including in the event of not limited to the processing of the collection, use, disclosure, dissemination and security of personal data.

#### **(2) Personal Data Processor**

Personal data processing activities in the form of collection, recording, recording and/or storage of personal data or the implementation of the preparation, adjustment, alteration of personal data, recovery of destroyed personal data and the collection, correction, deletion or destruction of personal data.

The development of information and communication technology has brought about changes in attitudes, patterns and lifestyles of people, for example patterns of behavior that are infinite or world without limits in social, cultural, economic and law enforcement relationships. Therefore it is necessary to collect, store and process data that was 1 before it was unpredictable and at this time a right that must be protected<sup>18</sup>.

<sup>12</sup> [www.privacyinternational.org](http://www.privacyinternational.org), retrieved 15 March 2021

<sup>13</sup> Sinta Dewi, Op.cit, pp. 25-26

<sup>14</sup> R.P. Bezanson, The Right to Privacy Revisited : Privacy, News and Social Change, 1890-1990, California Law Review, pp. 1134-1135

<sup>15</sup> Fanny Priscyllia, Protection of Personal Data Privacy in Legal Comparison Perspective, Jatiswara Journal, Volume 34 Number 3, November 2019, p. 242

<sup>16</sup> Sinta Dewi, Loc.cit, p. 26

<sup>17</sup> Sinta Dewi Rosadi, Garry Gumelar Pratama, Protection of Personal Data Privacy in the Digital Economy Era in Indonesia, VeJ Journal, Volume 4 Number 1, 2018, pp. 94-95

<sup>18</sup> Tejomurti, K. Hadi, H. Imamullah, M.N. & Indriyani R, Legal Protection for Urban Online-Transportation User's Personal Data Disclosure in the Age of Digital Technology, Journal of Law Padjadjaran, Volume 5 Number 3, 2018, pp. 487-488

The Indonesian Constitution in Article 28 G paragraph (1) of the 1945 Constitution has governed the protection of personal data, a person is entitled to the protection of one's personal self, family, honor, dignity and wealth as well as a sense of security from all forms of threats that exist from his ownership. It is based on this that the state guarantees the protection of the privacy of personal data. Abuse of this is a violation of constitutional rights<sup>19</sup>.

The regulation on the protection of personal data is stipulated in several Articles in Law No. 19 of 2016 concerning Amendments to Law No. 11 of 2008 on Information and Electronic Transactions, according to Sonny Zulhuda, in this Law does not implicitly regulate the use of personal data because the article contained in the Act is only a general provision and does not regulate or explain the issues that occur at the international level today<sup>20</sup>.

Uncertainty of privacy and personal data protection in Indonesia, due to the absence of legal instruments in accordance with the digital age. Legal instruments in the protection of privacy and personal data in the digital age must meet the following criteria<sup>21</sup>:

**1. Protection of privacy and personal data of international character**

In the digital age where physical storage of privacy and personal data is very difficult to find when done digitally. This data repository is no longer restricted by national juridical, as it will be cross-border<sup>22</sup>.

Law enforcement in the European Union established The Police Directive based on Directive 2016/680 which protects individuals in processing personal data that has an element of criminal offense in the application of criminal sanctions against personal data breaches committed by datasubjects<sup>23</sup>.

**2. Privacy Protection of Data as an adhesive element of individuals and communities**

The right to privacy and personal data must have an international character in the vagueness of its status in the protection of national law. In the protection of national law there are 2 (two) things to the protection of the law, namely the right that raises the distance between individuals and communities and the right to bring individuals closer to society<sup>24</sup>.

The absence of comprehensively governing rule of law against the protection of privacy and personal data poses a potential violation of one's constitutional rights. It is hoped that the Government and Parliament of Indonesia can soon amend the Bill on the Protection of Personal Data so that Indonesia will be better prepared to face economic challenges in the digital age and provide security guarantees against the protection of privacy and personal data of users and provide strict sanctions against those who misuse the personal data of others.

## Cyber Surveillance of Privacy and Personal Data

<sup>19</sup> Fanny Priscyllia, Op.cit,p. 244.

<sup>20</sup> Syarpani, Juridical Review of The Protection of Personal Data in Electronic Media (Based on Article 25 of Law No. 11 of 2008 on Information and Electronic Transactions, Beraja Niti Journal, Volume 3, Number 6, 2014, p. 7

<sup>21</sup> Sinta Dewi Rosadi, Op.cit, p. 104

<sup>22</sup> Stephen J. Schulhofer, An International Right to Privacy? Be Careful What You Wish for, International Journal of Constitution Law, Volume 14, 2016, p. 240

<sup>23</sup> Data Protection in the EU", [https://ec.europa.eu/info/law/law-topic/data-protection/data-protection-eu\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-protection-eu_en), was accessed on 12 March 2021

<sup>24</sup> Oliver Diggelmann, Maria Nicole Cleis, How the Right to Privacy Became a Human Right, Human Right Law Review, Volume 14, 2014, p. 458

Cyber surveillance is an attempt to collect data by countries to have an excess of information over other countries in the world with survival as its main goal<sup>25</sup>. Surveillance also functions as a system of a security device, this is explained by Ayse Ceyhan<sup>26</sup>.

Cyber surveillance of the public is carried out on public communication in the digital era in internet use is highly dependent on availability, integrity and confidentiality of information in the cyber sphere<sup>27</sup>, contonya if a person has done a transaction or registered in an organization or mailing list on the internet, to meet the completeness of the administration then the registrant sends his personal data<sup>28</sup>.

Therefore, there is a guarantee of conformity with the principles of protection of privacy and personal data, it is necessary to have a personal data protection authority, either in the form of a single supervisory authority or combined with its functions in other existing independent institutions. Preferably in the protection of personal data, the personal data protection authority combined with other independent bodies, given the efficiency and effectiveness, can be combined with the Information Committee or Ombudsman, so that this halnua will change the institutional structure of the body<sup>29</sup>.

Under the provisions of the Personal Data Protection Act shall expressly govern the Authority of personal data is an independent state institution and free from the intervention and interests of individuals, businesses and other state institutions. The authority stipulated in the law and its rules of implementation relates to the protection of personal data<sup>30</sup>.

Physical and movement surveillance activities will be easier to carry out due to the technology of oral or written communication and online commercial transactions. Cyber surveillance is used in a more context, the need for regulation and its use is consistent with social norms and laws. This cyber surveillance capability can systematically and involve all modern organizations and social control<sup>31</sup>. The state is the main beneficiary of cyber surveillance in carrying out its surveillance. The United States and Russia, for example, have conducted data analysis, collection and catalogs used in intelligence and security purposes<sup>32</sup>.

In general, the function of cyber surveillance agencies on the protection of personal data is to ensure the protection of the rights of data subjects, guarantee control and processor of data, to comply with and comply with laws and regulations and to make various efforts for all parties involved in the protection of personal data to respect the privacy of personal data<sup>33</sup>.

In carrying out these functions, the cyber regulatory body has a duty to<sup>34</sup>:

1. monitoring the compliance of all parties related to the protection of personal data;
2. receive complaints and resolve disputes;

<sup>25</sup> Jensen Carl J, David H. McElreath, and Melissa Graves, Introduction to Intelligence Studies, Boca Raton : CRC Press, 2013

<sup>26</sup> Ayse Ceyhan, Surveillance as Bipower, in routledge Handbook of Surveillance Studies, edited by Kirstie Ball, Kevin D. Haggerty and David Lyon, 38-45, New York : Routledge, p. 38

<sup>27</sup> Hidayat Chusnul Chotimah, Cyber Security Governance and Cyber Diplomacy in Indonesia, under The Institutional Cyber and Sandi State Agency, Politica Journal, Volume 10 Number 2, 2019, p. 114.

<sup>28</sup> Rosalinda Elsina Latumahina, Legal Aspects of Personal Data Protection in Cyberspace, Gema Aktualita Journal, Volume 3, Number 2, 2014, p. 14

<sup>29</sup> Wahyu Djafar and M. Jodi Santoso, Personal Protection: The Importance of Independent Supervisory Authority, Jakarta : Institute for Community Studies and Advocacy (ELSAM), 2019, p. 25

<sup>30</sup> *Ibid*

<sup>31</sup> Anggi Anggraeni Kusumoningtyas and Puspitasari, Dilemma of Personal Data Protection and Cyber Surveillance Rights: Challenges in the Future. Indonesian Journal of Legislation, Volume 17 Number 2, 2020, p. 243

<sup>32</sup> *Ibid*. p. 244

<sup>33</sup> Wahyu Djafar and M. Jodi Santoso, Loc.cit.p. 26

<sup>34</sup> *Ibid*.

3. accept, examine and decide on requests for settlement of personal data protection disputes through mediation and/or non-litigation adjudication submitted by the subject of personal data based on the reasons referred to in the law;
4. issue recommendations to data controllers and/or other relevant parties;
5. the authority may also issue recommendations necessary in order to meet the minimum standards in the protection of personal data under the law;
6. other tasks are coordination and negotiation, including coordinating with government agencies and the private sector in an effort to formulate and implement plans and policies to strengthen the protection of personal data, as well as negotiations in making agreements with other countries' personal data protection authorities;
7. the authority is also tasked with publishing guidance on personal data protection measures and coordinating with relevant agencies (including issuing technical regulations);
8. to take other measures relating to the protection of personal data.

Cyber surveillance of personal data requires a set of skills in utilizing data and informatics technology activities. Skills are needed including skills in the field of law, technology, administration and culture, so that coordination of arrangements with institutional and civil society groups that interact with regulatory bodies can provide a number of access points so as to facilitate in obtaining information and opinions both within the country and across countries.

This part presents results/findings and analysis of the findings. Figures or graphs can also be presented here to support your findings. We suggest that you mention supporting instrument(s), in forms of illustration, figure, photograph, table, and graph. Each instrument must be orderly numbered and given a title, followed by source from which you make the citation. Should the instrument is the result from the author's analysis, please write: 'source: author's analysis.'

In addition this part also contains reflection/discussion according to the research findings. In presenting the discussion, use a comprehensive explanation in order to elaborate the whole data found during the research. By doing so, you can fill gap of knowledge. Findings that rely on meaning construct tends to present a theoretical framework, so there will be an unnecessary repetition as it has been presented in the research methodology.

## CONCLUSION

The protection of privacy and personal data in Indonesia is one of the constitutional rights for its citizens, therefore there needs to be legal certainty in its protection, if there are parties who violate privacy and personal data. The State must specifically regulate its laws and establish an independent or aggregated cyber surveillance agency against other independent institutions, to ensure the application of personal data protection laws. Cyber surveillance agencies have a function as surveillance against all forms of violations of privacy and personal data in Indonesia.

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