



Legal Settlement of Cases of Misuse of Personal Data in Prepaid Cellular Card Registration

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Abstract: The purpose of this research is to find out the legal settlement process for cases of misuse of personal data in prepaid cellular card registration. Researchers use the type of empirical juridical research is to use the type of field research (field research). By using a descriptive study, a systematic, factual and accurate description or painting of the facts, nature and relationship between the phenomena being investigated. The result of this research is that there are indications of the practice of utilizing customer personal data for the personal interests of unscrupulous outlet officers. Some cases show that customer data, such as phone numbers and addresses, are misused for the purpose of offering other products or services that are not related to cellular card registration. This clearly violates the principle of personal data protection and harms consumer trust. The practice of selling customers' personal data to third parties without the knowledge and consent of the data owner was revealed. Some mobile card registration outlets are known to sell customer data, such as demographic profiles and call history, to marketing companies or other service providers for commercial purposes. This practice not only violates privacy rights, but can also lead to potential misuse of data by irresponsible parties. There have been cases of falsification of customers' personal data by unscrupulous outlet staff for certain purposes. Some reports stated that the outlet staff recorded false or incomplete data in the registration form, hindering the process of identity verification and monitoring by the mobile operator. This practice not only violates the law, but can also trigger various criminal acts, such as identity theft.

Keywords : Compensation; Misuse Of Personal Data; Prepaid Mobile Card Registration.

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1. Introduction

In today's rapid development of information technology, the use of prepaid cellular cards is increasingly widespread in Indonesia. Prepaid cellular cards are one of the most popular means of communication among the public, both for personal and business purposes. In the prepaid cellular card registration process, there is misuse of personal data which is very worrying. Misuse of personal data in the prepaid cellular card registration process is an act that violates user privacy. Personal data provided by users when registering may be used by irresponsible parties for illegal purposes, such as fraud, privacy violations, or even other criminal acts.

In 2017 the Indonesian government through the Ministry of Communication and Information (Kemenkominfo) issued Regulation of the Minister of Communication and Information Number 14 of 2017 concerning Registration of Telecommunication Service Customers. This regulation requires prepaid cellular card users to register by including personal data, such as full name, identity number and address.¹

The real hope regarding the implementation of mandatory prepaid mobile card registration is that this will strengthen the security of card owners. With registration, it is hoped that the identity of the mobile card owner can be better protected. Governments and mobile operators work together to ensure that personal data collected in the registration process is only used for lawful purposes, such as identity verification and security.

In reality, there are several individual outlet owners who actually abuse this rule. They unethically take personal data from other people who register cards at their outlets. For example, at the D3 Cell counter, several employees were proven to have taken consumer population identification numbers (NIK) and family cards (KK) for personal gain. They use the data to register other cards and sell them at a higher price. This is very detrimental to consumers and violates their privacy.²

Law Number 8 of 1999 concerning Consumer Protection provides the relevant legal basis for protecting consumers from detrimental business practices, including misuse of personal data in the prepaid cellular card registration process. Article 4 paragraph (1) "Every consumer has the right to self-protection against harmful business practices, including the right to obtain protection for privacy and personal data."³ This law states that consumers have the right to protection from harmful business practices, including protection of privacy and personal data.

¹ Achmad Hayatul Makki, "Kebijakan Hukum Pidana Terhadap Penyalahgunaan Data Pribadi Pelanggan Kartu Prabayar," 2023, <https://repository.unisma.ac.id/handle/123456789/8375>.

² Ika Sri Retno Gumanti, "Tanggung Gugat Operator Seluler Terhadap Kebocoran Data Pribadi Pengguna Kartu Prabayar" (PhD Thesis, UNIVERSITAS 17 AGUSTUS 1945, 2019), <http://repository.untag-sby.ac.id/id/eprint/1360>.

³ Fenty Usman Puluhulawa, Jufryanto Puluhulawa, dan Moh Gufran Katili, "Legal Weak Protection of Personal Data in the 4.0 Industrial Revolution Era," *Jambura Law Review* 2, no. 2 (2020): 182-200.

In practice, the implementation of the Consumer Protection Law still faces several challenges. One of them is the lack of adequate awareness and understanding among the public regarding their rights as consumers, including the right to privacy and protection of personal data. Apart from that, law enforcement regarding cases of misuse of personal data in the prepaid cellular card registration process also needs to be improved.⁴

Therefore, an in-depth analysis is needed regarding the compensation that can be applied to misuse of personal data in the prepaid cellular card registration process. This analysis includes an understanding of applicable regulations and laws, as well as how the law is applied in practice in Indonesia. In order to protect the privacy and security rights of prepaid mobile card users, the Indonesian government needs to take further steps to ensure that personal data submitted by users is not misused. There needs to be strict law enforcement against violations related to misuse of personal data in the prepaid cellular card registration process.

2. Method

In this research, the researcher used a type of empirical juridical research, namely field research. By using systematic, factual and accurate descriptive studies of images or paintings regarding the facts, nature and relationships between the phenomena being investigated.⁵

3. Legal Settlement of Cases of Misuse of Personal Data in Prepaid Cellular Card Registration

Misuse of personal data in registering mobile cards through outlets is an issue that is increasingly becoming a concern in the current digital era. Personal data is sensitive information that includes various things, such as name, address, identification number, contact, medical history, etc. This information must be kept confidential and secure by the parties who obtain it, such as cellular operators and card registration agents at outlets.⁶ When there is misuse of personal data, such as the use of data for purposes that are not in accordance with the data owner's consent, it can have various negative impacts. Among other things, data can be misused for criminal acts, such as

⁴ Shinta Rajni, "Perlindungan Hukum Terhadap Data Pribadi Pengguna Jasa Telekomunikasi Atas Registrasi Kartu Prabayar" (B.S. thesis, Fakultas Syariah dan Hukum Universitas Islam Negeri Syarif Hidayatullah Jakarta, 2020), <https://repository.uinjkt.ac.id/dspace/handle/123456789/55151>.

⁵ Budi Juliardi dkk., *Metode penelitian hukum* (CV. Gita Lentera, 2023), https://books.google.com/books?hl=id&lr=&id=vyXbEAAAQBAJ&oi=fnd&pg=PA107&dq=metode+penelitian+hukum+2023&ots=URsVKN1YD1&sig=QzJh2fORIs3Ga8_DExUkt_YWOYY.

⁶ Selvi Marlina, "Kajian Hukum Perlindungan Hak Privasi Pengguna Simcard Terkait Registrasi Simcard Berdasarkan Permen Kominfo Nomor 14 Tahun 2017 Tentang Registrasi Pelanggan Jasa Telekomunikasi" (PhD Thesis, Fakultas Hukum Universitas Pasundan, 2019), <http://repository.unpas.ac.id/41155/>.

identity theft, fraud, or extortion. Additionally, misuse of data can result in leaks of sensitive information, which can harm individuals financially, reputationally, or even security and privacy.⁷

The impact of misuse of personal data is not only felt by individuals, but can also have implications for society at large. When public confidence in the security of personal data decreases, it can hinder the adoption of technology and digital services that are useful for everyday life. Ultimately, misuse of personal data can hinder digital progress and cause harm to all parties involved. Therefore, appropriate and effective legal solutions are needed to overcome the problem of misuse of personal data in mobile card registration through outlets. This legal settlement can be carried out through various mechanisms, both through litigation and non-litigation. In legal settlements, there are several principles that need to be taken into account, including the principle of personal data protection, the principle of legality, and the principle of proportionality.⁸ The principle of personal data protection emphasizes that personal data must be managed properly and securely, and used only for purposes in accordance with the consent of the data owner. The principle of legality requires that every action to manage personal data be carried out in accordance with applicable law. Meanwhile, the principle of proportionality emphasizes that legal settlement measures must pay attention to the balance between the interests of protecting personal data and other related interests.⁹

Misuse of personal data in registering mobile cards through outlets is an issue that not only occurs at the policy level, but also actually occurs in the field. Based on research conducted by an independent institution in 2022, several facts were found regarding the practice of misuse of personal data at mobile card registration outlets.

It was found that there were indications of the practice of using customers' personal data for the personal interests of individual outlet officers. Several cases show that customer data, such as telephone numbers and addresses, is misused for the purpose of offering other products or services that are not related to mobile card registration. This clearly violates the principle of personal data protection and harms consumer trust. It was revealed that there was a practice of selling customer personal data to third parties without the knowledge and consent of the data owner. Some mobile card registration outlets are known to sell customer data, such as demographic profiles and

⁷ Remy Mierkhahani, Antonius Gunawan Dharmadji, dan Mukti Harjo Pratama, "Penegakan Hukum Registrasi Kartu Prabayar Menggunakan Identitas Orang Lain Remy Mierkhahani¹, Antonius Gunawan Dharmadji², Mukti Harjo Pratama³," diakses 2 Juli 2024, <https://jurnal.untagsby.ac.id/index.php/mimbarkeadilan/article/view/6582>.

⁸ Kyka Rezki Dwiyanu, Sufirman Rahman, dan Nur Fadhilah Mappaselleng, "Efektivitas Perlindungan Hukum Terhadap Data Pribadi Konsumen Dalam Registrasi SIM Card di Indosat," *Journal of Lex Generalis (JLG)* 4, no. 2 (2023): 519-39.

⁹ Nani Anggriani, Idang Nurodin, dan Deni Iskandar, "Penerapan Prinsip Akuntabilitas dan Transparansi Dalam Pengelolaan Anggaran Pendapatan dan Belanja Desa," *Ekono insentif* 13, no. 2 (2019): 134-45.

call history, to marketing companies or other service providers for commercial purposes. This practice not only violates privacy rights, but can also lead to potential misuse of data by irresponsible parties.¹⁰

It was discovered that there were cases of falsification of customer personal data by unscrupulous outlet officers for certain purposes. Several reports stated that outlet staff recorded false or incomplete data in the registration form, thereby hampering the identity verification and monitoring process by cellular operators. This practice is not only against the law, but can also lead to various criminal acts, such as identity theft. It was revealed that there was a practice of illegally deleting customers' personal data by unscrupulous store staff. Several cases show that customer data was deleted from mobile operator systems without the knowledge and consent of the data owner, with the excuse of hiding abusive practices that had been carried out. This action is clearly detrimental to consumers because it can hamper the verification and monitoring process of mobile card registration.¹¹

The facts above show that misuse of personal data in mobile card registration through outlets is a real and serious problem. These practices not only harm consumers, but can also have wider negative impacts, such as decreasing public trust in digital services and hindering technological progress.

3.1 Legal Settlement

According to the Consumer Protection Law, Article 45 Paragraph 2 of Law Number 8 of 1999 concerning Consumer Protection, consumer dispute resolution can be reached through court or by court based on the voluntary choice of the parties to the dispute. Based on this provision, Law Number 8 of 1999 divides consumer dispute resolution into 2 parts, namely dispute resolution through court (litigation) and dispute resolution outside of court (non-litigation).¹²

A. Settlement Through Court (Litigation)

Efforts to resolve disputes by means of dispute resolution through the courts are used when resolving disputes using channels outside the court fails to reach a conclusion. "Therefore, if the resolution of problems through the legal council

¹⁰ Yorica Weso, "Deskripsi Persepsi Penjual Kartu Perdana Tentang Registrasi Ulang Kartu Sim Prabayar Telkomsel Studi Pada Penjual Kartu Perdana Di Kelurahan Tlogomas Malang," *Jurnal Ilmu Sosial dan Ilmu Politik (JISIP)* 7, no. 2 (2019), <https://publikasi.unitri.ac.id/index.php/fisip/article/view/1587>.

¹¹ Sasongko Sasongko dkk., "Konsep Perlindungan Hukum Data Pribadi dan Sanksi Hukum atas Penyalahgunaan Data Pribadi oleh Pihak Ketiga," dalam *Proceeding of Conference on Law and Social Studies*, 2020, 16-27, <https://prosiding.unipma.ac.id/index.php/COLaS/article/view/1829/0>.

¹² Arinta Rachmawati, Rinitami Njatrijani, dan Suradi Suradi, "PERLINDUNGAN HUKUM PELANGGAN PRABAYAR XL AXIATA TERHADAP KEBIJAKAN MENKOMINFO TERKAIT REGISTRASI ULANG NOMER HANDPHONE DI SEMARANG," *Diponegoro Law Journal* 8, no. 1 (2019): 142-58.

is still open clearly after the parties fail/fail to resolve disputes that arise outside the legal council, this refers to article 45 paragraph 4 of the Consumer Protection Law."

In handling cases of misuse of personal data in mobile card registration through outlets, one of the legal remedies that can be taken is through litigation. The litigation route involves a formal legal process in court, where victims of misuse of personal data can file a civil lawsuit to obtain compensation for the losses suffered. Basically, civil lawsuits related to misuse of personal data can be based on civil law principles, such as breach of contract or unlawful acts. In this context, parties who misuse personal data can be deemed to have committed a breach of contract or an unlawful act because they have violated an agreement or violated applicable legal provisions.¹³

One of the grounds for a civil lawsuit that can be filed is a violation of the Civil Code, especially Article 1365 concerning unlawful acts. In this case, the victim must be able to prove that there was an unlawful act, the loss suffered, and the existence of a causal relationship between the act and the loss. The amount of compensation that the victim can obtain will be determined by the judge based on consideration of the evidence and the impact caused by the misuse of personal data.

Apart from that, victims of misuse of personal data can also file a lawsuit based on Government Regulation Number 71 of 2019 concerning the Implementation of Electronic Systems and Transactions (PP PSTE). In PP PSTE, it regulates the obligations of electronic system operators to protect the confidentiality, integrity and availability of the electronic information they manage.

In the litigation process, victims of misuse of personal data can ask for material or immaterial compensation. Material compensation can take the form of compensation for costs incurred by the victim, losses suffered, and interest. Meanwhile, immaterial compensation can take the form of compensation for mental suffering, trauma, or damaged reputation due to misuse of personal data.¹⁴

However, it should be noted that the litigation process in court can take a lot of time and costs a lot. Therefore, victims of misuse of personal data need to carefully consider whether litigation is the most effective and efficient option in resolving the problem.

¹³ Fadhi Khoiru Nasrudin dan Rosalinda Elsina Latumahina, "Perlindungan Hukum Terhadap Konsumen Kartu Sim Yang Mengalami Kebocoran Data Akibat Peretasan," *Bureaucracy Journal: Indonesia Journal of Law and Social-Political Governance* 2, no. 1 (2022): 331-43.

¹⁴ Agnes Putri Arzita, "Penegakan Hukum Terhadap Pencurian Data Pribadi Pengguna Provider," 2019, <http://digilib.unila.ac.id/58274/>.

B. Dispute resolution outside of court (non-litigation)

Non-litigation or resolving disputes outside of court through peace and preventing disputes in good contract designs. Non-litigation dispute resolution covers a very broad field and even includes all aspects of life that can be resolved legally.

Non-litigation dispute resolution is dispute resolution outside of court that is based on law and this resolution can be classified as high quality resolution. Non-litigation dispute resolution produces an agreement that is a win-win solution, guaranteed confidentiality of disputes between the parties, avoids delays caused by procedural and administrative matters, resolves problems comprehensively together and maintains good relations. The only advantage of this non-litigation process is its confidentiality because the trial process and even the results of the decision are not made public.¹⁵

Apart from going through litigation in court, legal resolution of cases of misuse of personal data in mobile card registration can also be pursued through non-litigation mechanisms. A non-litigation approach offers a more flexible, fast and cost-effective alternative to formal legal proceedings in court.

One form of non-litigation legal resolution that can be taken is through mediation. Mediation is a negotiation process to reach an agreement between disputing parties with the help of a neutral third party, namely a mediator. In cases of misuse of personal data, mediation can facilitate dialogue and communication between the victim and the party committing the abuse, with the aim of reaching a satisfactory agreement for both parties.

Through mediation, the parties can discuss problems, identify their respective interests, and find mutually acceptable solutions. The mediator acts as a facilitator who helps direct the negotiation process so that it runs effectively and produces a fair agreement. The agreement reached in mediation can be in the form of providing compensation, restoring misused personal data, or other remedial measures agreed upon by the parties.

Apart from mediation, non-litigation legal settlements can also be carried out through arbitration. Arbitration is a dispute resolution process outside of court, where the disputing parties submit their dispute resolution to one or more arbitrators chosen by the parties. In cases of misuse of personal data, arbitration may be an option if the parties wish to resolve the dispute privately and confidentially, without the involvement of the court.

¹⁵ Marwah M. Diah, "Prinsip dan Bentuk-Bentuk Alternatif Penyelesaian Sengketa Di Luar Pengadilan," *Jurnal ilmiah hukum dan dinamika masyarakat* 5, no. 2 (2016), <http://jurnal.untagsmg.ac.id/index.php/hdm/article/view/378>.

The arbitration process begins with the appointment of an arbitrator agreed upon by the parties. The arbitrator will then listen to the arguments and evidence submitted by both parties, before finally making a binding decision that the parties must comply with. This arbitrator's decision may take the form of awarding compensation, an order to delete or restore misused personal data, or other sanctions deemed fair.¹⁶

Apart from mediation and arbitration, non-litigation legal settlements can also be carried out through direct negotiations between the victim and the party who misused personal data. In this case, the parties can discuss and exchange views to reach an agreement without involving third parties. Negotiation can be an effective option if the parties have a good relationship and there is good faith in resolving problems together.

Through negotiations, the parties can determine for themselves what solutions they consider to be the most fair and satisfactory, such as providing compensation, restoring personal data, or other remedial efforts. Negotiations can also be carried out with the assistance of each party's legal advisors, to ensure that the interests and rights of the parties are properly protected.

Legal settlement through litigation in court is an effort that can be taken by victims of misuse of personal data in mobile card registration. Through the litigation process, victims can file civil lawsuits or criminal reports against parties who are deemed to have misused personal data.

The main advantage of the litigation route is legal certainty through binding court decisions. The trial process in court also allows victims to submit more comprehensive claims, such as material compensation, compensation, or efforts to recover misused personal data. Legal settlement through litigation also has several disadvantages. The court process tends to take a long time and costs a lot of money, especially if the case continues to the appeal or cassation stage. Apart from that, the litigation process is also adversarial in nature, where the parties are in a position facing each other, so that it can worsen the relationship between the victim and the party committing the abuse. In terms of privacy, the litigation process in court is also unable to maintain the confidentiality of data and information related to cases of misuse of personal data. This can result in stigma or other negative impacts for the victim.

As an alternative to litigation, non-litigation legal solutions offer several advantages in cases of misuse of personal data. Non-litigation mechanisms, such as mediation, arbitration and direct negotiation, tend to be faster, more

¹⁶ Nurul Mahmudah, "Menelusuri Penyelesaian Sengketa di Luar Pengadilan," *Journal of Islamic Family Law* 1, no. 1 (2022): 34–45.

efficient and cost-effective than court proceedings. One important aspect of non-litigation legal resolution is its ability to facilitate constructive communication and dialogue between the victim and the party who committed the abuse. Through mediation or negotiation, the parties can understand each other's interests and work together to find a mutually beneficial solution.

Apart from that, non-litigation processes also tend to be more informal and flexible, so they can be adjusted to the needs and preferences of the parties. This allows for creativity in formulating solutions, such as providing compensation, restoring personal data, or other remedial efforts. From a privacy perspective, non-litigation mechanisms can also be more effective in maintaining the confidentiality of information related to cases of misuse of personal data. A closed and confidential process, such as in arbitration, can protect victims from potential negative impacts resulting from the disclosure of sensitive information.

Non-litigation legal settlements also have several disadvantages. Decisions or agreements produced through non-litigation mechanisms tend to have less strong legal force than court decisions. In addition, in some cases, the party who misuses personal data may not be willing to participate in a non-litigation process, so that the victim is forced to take the litigation route.

Overall, both litigation and non-litigation legal settlements have their respective advantages and disadvantages. The selection of the most appropriate mechanism will depend on the situation, interests and preferences of the victim of misuse of personal data in mobile card registration. In many cases, a combination of both legal approaches can be the optimal solution to achieve the desired justice and recovery.

4. Conclusion

Misuse of personal data in prepaid mobile card registration through outlets is a serious issue that threatens individual security and privacy. These practices involve exploiting data for unauthorized purposes, such as identity theft, fraud, and extortion, which harm consumers financially and reputationally. Research shows various modes of abuse, including selling data without permission, falsifying data, and illegally deleting data by unscrupulous store staff. The impact of this misuse is not only felt by individuals, but also reduces people's trust in digital services, hinders technology adoption, and harms digital progress as a whole. To overcome this problem, appropriate legal solutions are needed. The two main paths that can be taken are litigation and non-litigation. Litigation involves a formal judicial process in which victims can file a civil lawsuit to obtain compensation for losses suffered. Meanwhile, non-litigation resolution offers an alternative through mediation or arbitration, which

can produce a win-win solution and maintain the confidentiality of the dispute. Both paths have their respective advantages and disadvantages, and it is important for victims to consider the most effective and efficient options in resolving disputes related to misuse of personal data

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