

**ENFORCING CONSUMER PROTECTION IN INDONESIA THROUGH
THE ROLE OF DATA PROTECTION OFFICERS:
RECOMMENDATIONS BASED ON THE BEST PRACTICES OF THE EU
AND SINGAPORE**

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ABSTRACT

Recognizing the urgency of Data Protection Officers ("DPOs") appointment in e-commerce businesses, this research aims to first, elucidate the contribution of DPOs in enforcing consumer protection in e-commerce businesses in Indonesia, the EU, and Singapore. Second, provide recommendations on interpreting DPO-related provisions in Law No. 27 of 2022 on Personal Data Protection ("Indonesian PDP Law") by analyzing the best practices of DPOs in the EU and Singapore.

This study is normative legal research conducted in a comparative manner with qualitative analysis and case law analysis. Data is obtained by analyzing the consumer protection and PDP laws in Indonesia, the European Union ("EU"), and Singapore, as well as books, journals, case studies, technical guidelines, reports, and legal writings.

This study emphasizes two primary findings. Firstly, that DPOs contribute to the enforcement of consumer protection through their role in ensuring the compliance of e-commerce businesses with PDP obligations. This is because there exist integral connections between consumers' and data subjects' rights as reflected in Indonesia, the EU, and Singapore. Secondly, in interpreting DPO-related provisions in the Indonesian PDP Law, Indonesian e-commerce businesses are advised to refer to the best practices of DPOs in the EU and Singapore pertaining to DPOs' roles and responsibilities, as well as qualifications.

Keywords: Data Protection Officer, Personal Data Protection, Consumer Protection, Comparative Law

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**MENEGAKKAN PERLINDUNGAN KONSUMEN DI INDONESIA
MELALUI PERAN PETUGAS PERLINDUNGAN DATA:
REKOMENDASI BERDASARKAN PRAKTIK TERBAIK DI EU
DAN SINGAPURA**

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INTISARI

Menyadari pentingnya penunjukan Petugas Perlindungan Data (“DPO”) dalam bisnis e-commerce, penelitian ini bertujuan untuk pertama, menjelaskan kontribusi DPO dalam menegakkan perlindungan konsumen di bisnis e-commerce di Indonesia, EU, dan Singapura. Kedua, memberikan rekomendasi untuk menginterpretasikan ketentuan terkait DPO dalam Undang-Undang Nomor 27 Tahun 2022 tentang PDP (“UU PDP”) dengan menganalisa praktik terbaik DPO di EU dan Singapura.

Penelitian ini merupakan penelitian hukum normatif yang dilakukan secara komparatif dengan analisis kualitatif dan analisis kasus hukum. Data diperoleh dengan menganalisis peraturan perlindungan konsumen dan PDP di Indonesia, Uni Eropa (“EU”), dan Singapura, serta buku, jurnal, studi kasus, pedoman teknis, laporan, dan tulisan hukum.

Studi ini menekankan dua temuan utama. Pertama, bahwa DPO berkontribusi terhadap penegakan perlindungan konsumen melalui peran mereka dalam memastikan kepatuhan bisnis e-commerce terhadap kewajiban PDP. Hal ini karena karena terdapat hubungan yang integral antara hak konsumen dan subjek data sebagaimana tercermin di Indonesia, EU, dan Singapura. Kedua, dalam menginterpretasikan ketentuan terkait DPO dalam UU PDP, pelaku usaha e-commerce Indonesia disarankan untuk mengacu pada praktik terbaik DPO di EU dan Singapura mengenai peran dan tanggung jawab serta kualifikasi DPO.

Kata Kunci: Petugas Perlindungan Data, Perlindungan Data Pribadi, Perlindungan Konsumen, Hukum Komparatif

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