


## Legal Protection of Borrower's Personal Data in Online Loan Application Services

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| Article Info   | ABSTRACT  |
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| <p><b>Keywords:</b><br/>Legal Protection,<br/>Personal Data,<br/>Online Loans,<br/>Fintech.</p>  | <p>The rapid development of information technology has driven the emergence of various digital financial services, one of which is online lending applications. However, behind this ease of access, various problems have arisen related to the misuse of borrowers' personal data by service providers and third parties. This study aims to analyze the legal protection of borrowers' personal data in online lending applications and to assess the effectiveness of applicable regulations in Indonesia. The research method used is a normative juridical approach with a statutory and conceptual approach. Data was obtained through a literature review of laws and regulations such as Law Number 27 of 2022 concerning Personal Data Protection, the Electronic Information and Transactions (ITE) Law, the Financial Services Authority Regulation, and regulations related to financial technology. The results show that legal protection of borrowers' personal data in online lending services in Indonesia has not been optimally implemented, despite the legal basis provided by the ITE Law, POJK No. 77/POJK.01/2016, and most recently, Law No. 27 of 2022 concerning Personal Data Protection (PDP Law). In practice, violations often occur in the form of the distribution and misuse of users' personal data without valid consent. The Personal Data Protection Law (PDP) actually provides more comprehensive protection by affirming the rights of data owners and the obligations and responsibilities of fintech providers to maintain user data confidentiality. However, its implementation remains weak due to a lack of oversight and legal awareness among both providers and users.</p> |
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### INTRODUCTION

Rapid technological developments have brought about significant changes in human life, with almost every aspect of activity now dependent on technological advancements. Technology facilitates interaction and connectivity between people through internet networks, accessible anytime and anywhere, particularly through the use of smartphones, which have become a primary need for modern society (Tampi, 2018). Currently, various activities can be monitored and conducted online, including in the financial sector. One concrete manifestation of technological advancement in this sector is the presence of online lending services, which make it easier for people to meet their financial needs quickly and conveniently (Disemadi, 2022).

Online lending is a digital technology-based financial service that allows people to apply for loans through an online application or platform without having to visit a conventional financial institution like a bank in person. The loan application process is quick and convenient, simply by filling in personal data, uploading supporting documents, and awaiting verification from the service provider (Novendra & Aulianisa, 2020). Online loans are typically provided by financial technology (fintech) companies operating under the supervision of the Financial Services Authority (OJK). Despite providing convenience and broad access for the public, especially those excluded from traditional banking services, online lending also poses various risks, one of which relates to the security and protection of borrowers' personal data (Oemardi & Sudiro, 2024).

Personal data protection is a fundamental part of human rights inherent in every individual. The state has a responsibility not only to grant this right, but also to ensure that every citizen is guaranteed protection from all forms of personal data misuse (Mutiarra & Maulana, 2020). In this increasingly advanced and complex digital era, personal data has become a valuable asset vulnerable to exploitation, particularly in technology-based economic activities such as online lending services. The government, through existing regulations, is expected to provide strong legal protection mechanisms to prevent individual data from being misused arbitrarily by irresponsible parties (Argiansyah & Prawira, 2024). In this context, legal protection of personal data is a crucial pillar in maintaining public trust in the digital financial system.

However, in practice, numerous cases of privacy violations are still found in online lending services. Borrowers' personal data is often collected without explicit consent or used for purposes beyond the original purpose of data collection. It is also not uncommon for sensitive information such as personal contacts, financial data, and customer identities to be disseminated to third parties without permission (Priliasari, 2019). This situation demonstrates the weak implementation of legal protection and minimal oversight of digital financial service providers. As a result, borrowers often suffer psychological and material losses due to the misuse of their data. Although online lending services offer convenience and quick access to financial needs, user security and privacy remain crucial issues that require serious attention through strict law enforcement and strengthening of personal data protection regulations (Satria & Handoyo, 2022).

Several previous studies have highlighted the issue of personal data protection in online lending services. Manurung & Thalib (2022) emphasize legal protection under Law Number 27 of 2022 concerning Personal Data Protection. However, this study focuses more on normative aspects and therefore does not detail the implementation of data protection in the field. Wijayantod et al. (2020) emphasizes the public's weak legal literacy and lack of law enforcement, but their focus is limited to illegal operators without examining the practices of legal providers.

Other studies, such as Pane & Kansil (2023), outline the legal responsibilities of online lending service providers for user data, but they place less emphasis on technical aspects, such as data security systems and internal audits. Wijayanti and Santoso (2023) assess the effectiveness of the Financial Services Authority (OJK)'s oversight of fintech lending, showing

that oversight remains limited to licensed fintech platforms, while many illegal platforms continue to operate without adequate oversight. Furthermore, Darmayanti & Wiraguna (2025) conducted an empirical analysis of user data breach cases, revealing security system weaknesses and a lack of transparency among providers, but did not fully discuss recovery mechanisms for data breach victims.

Based on these studies, several important research gaps remain. Most studies emphasize normative aspects and fail to deeply link them to practical implementation in the field. Previous research also rarely combines legal analysis with empirical and technical approaches, such as data oversight, system security, and internal audits of providers. Redress mechanisms for victims of personal data breaches, including the right to compensation and continued protection, are still minimally discussed. Therefore, this study aims to fill this gap by comprehensively analyzing legal protection for borrowers' personal data, examining regulatory implementation and oversight mechanisms, and providing practical and integrated policy recommendations. With this approach, the research is expected to bridge the gap between existing regulations and actual practices in the field, while simultaneously strengthening the security and data protection of online loan service users.

## METHOD

This research uses a normative juridical method with a statutory and conceptual approach. The statutory approach is conducted by examining relevant laws and regulations, including Law Number 27 of 2022 concerning Personal Data Protection, Financial Services Authority (OJK) regulations regarding fintech lending, and other regulations governing the security and management of data for online loan service users. The conceptual approach is used to analyze concepts and theories related to personal data protection, data subject rights, and the responsibilities of digital financial service providers. This research is descriptive and analytical in nature, aiming to describe the state of legal protection and evaluate the effectiveness of regulations in online lending service practices.

In addition, this research also utilizes library research and secondary documents as data sources, including academic literature, data breach case reports, scientific articles, and government and OJK policy documents. The data obtained are analyzed qualitatively through content analysis techniques, namely interpreting the content of regulations and literature to identify patterns, gaps, and relevance between legal norms and data protection practices in the field. With this approach, the research is expected to produce comprehensive conclusions regarding the legal protection of borrowers' personal data and provide applicable policy recommendations for regulators and loan service providers. on line.

## RESULT AND DISCUSSION

Legal protection for users of technology-based financing products, particularly Fintech Peer-to-Peer (P2P) Lending, is crucial for increasing trust in modern society. These services provide access to capital for individuals or businesses that struggle to access the conventional banking system. According to Ibrahim (2025), clear legal protection for lenders and borrowers

on P2P Lending platforms can encourage public participation while strengthening a safe and trustworthy digital financial ecosystem.

The Financial Services Authority (OJK) has issued several regulations related to P2P Lending, such as OJK Regulation No. 77/POJK.01/2016 concerning Information Technology-Based Lending and Borrowing and SeoJK Regulation No. 18/SEOJK.01/2017 concerning Governance and Risk Management of Information Technology in Information Technology-Based Lending and Borrowing Services. While these regulations provide a legal framework for P2P Lending providers, their implementation has not yet fully encompassed legal protection for service users, both lenders and borrowers.

Furthermore, the Consumer Protection Regulation in the Financial Services Sector, stipulated in POJK Number 1/POJK.07/2013, does not explicitly include P2P Lending within its scope of protection. As a result, users of P2P Lending services do not fully enjoy the same legal guarantees as consumers in other financial sectors. This creates potential risks, particularly related to the misuse of personal data and the transparency of platform operators' operations.

In the context of personal data protection, legal provisions are also regulated through Article 26 of the Electronic Information and Transactions Law (UU ITE), which regulates the rights of data subjects and the obligations of data managers. However, this protection is still general and does not specifically address the characteristics of P2P Lending services, which involve the digital collection, management, and distribution of users' financial and personal data. Therefore, a more comprehensive understanding and implementation of regulations is needed to ensure more effective and operational legal protection for P2P lending service users in the field.

Specifically, the protection of borrowers' personal data in online lending services is regulated in Financial Services Authority Regulation (POJK) Number 77/POJK.01/2016 concerning Information Technology-Based Lending Services. Article 26 emphasizes that service providers have a full obligation to maintain the confidentiality, integrity, and availability of users' personal data. Furthermore, the use of personal data by providers is permitted only after obtaining the consent of the data owner, except under conditions expressly stipulated by other laws and regulations. This provision emphasizes the importance of providers' responsibility in safeguarding users' privacy rights as part of efforts to build public trust in online lending services.

In the event of violations, there are provisions governing the legal consequences for providers who violate personal data protection. Article 45 of the ITE Law stipulates criminal sanctions for violations, including defamation that can result from the misuse of personal data. In addition to criminal sanctions, POJK No. 77/POJK.01/2016 specifically stipulates administrative sanctions through Article 47 paragraph (1), which include written warnings, fines, restrictions on business activities, and even revocation of the organizer's operational permit. This combination of criminal and administrative sanctions aims to provide a deterrent effect while ensuring the organizer's compliance with its obligations to protect users' personal data.

Strong regulations are expected to address the fundamental problems frequently encountered in fintech services, such as weak confidentiality, security, integrity, and reliability of users' personal data. Clear and firm regulations are also needed to ensure that fintech companies, particularly those operating in the online lending sector, conduct their activities with due regard for the principles of prudence, transparency, and legal responsibility (Disemadi & Regent, 2021). Thus, legal protection for fintech users is not merely normative but can also be implemented effectively to provide a sense of security and legal certainty for the public as service users.

Beyond regulatory considerations, public caution when using online lending services is also crucial. To prevent potential personal data breaches, the public is advised not to use online lending services indiscriminately, except in truly urgent circumstances and after ensuring that the platform is officially registered with the Financial Services Authority (OJK). This aims to avoid the risk of misuse of personal data by irresponsible parties.

On the other hand, online lending providers also have a moral and legal responsibility to conduct their business activities honestly, in good faith, and in accordance with laws and regulations. They are obliged to ensure that customer personal data is used correctly and securely, is not disseminated without permission, and maintains its confidentiality. Good data governance practices will strengthen public trust in fintech services and encourage the creation of a digital financial ecosystem with integrity.

With the increasing use of online lending services, it is important to further examine the legal protection of borrowers' personal data, as well as the sanction mechanisms for personal data breaches committed by service providers. This is crucial considering that online lending not only provides easy access to financing but also poses significant risks if users' personal data is not properly protected (Roza et al., 2024). Therefore, synergy is needed between policymakers, supervisory agencies, fintech providers, and the public to create a strong, fair, and adaptive legal protection system for digital technology developments.

Law Number 39 of 1999 concerning Human Rights provides a strong legal basis for the right to personal protection as part of the basic human rights of every individual. Article 29 paragraph (1) states that "Everyone has the right to personal protection," which can be interpreted as the state's recognition of the right to privacy. This right includes the freedom of every individual to safeguard and keep personal information confidential from access or misuse by others. Thus, personal data protection is not merely a technological issue, but an integral part of human rights that must be guaranteed, respected, and protected by the state. This view aligns with the opinion of Wiranjaya and Ariana (2016), who assert that the right to privacy includes the right to keep private matters private, including information that can directly identify an individual, from the public.

Furthermore, legal protection of personal data is also regulated more specifically in Law Number 19 of 2016 concerning Amendments to Law Number 11 of 2008 concerning Electronic Information and Transactions (ITE Law). Article 26 paragraphs (1) and (2) of the ITE Law stipulates that any use of a person's personal data through electronic media must be based on the consent of the data owner. This provision provides a legal basis for the public to assert their rights in the event of a privacy violation, such as unauthorized misuse of

personal data. Therefore, this regulation is not merely declarative but also provides a concrete legal protection mechanism, namely through the right to file a lawsuit against the violating party.

The provisions in Article 26 of the ITE Law demonstrate that Indonesian national law has begun to recognize the importance of personal data protection as an enforceable legal right. Personal data owners have the authority to determine who may access, manage, and use their data. If the data is used without permission and results in harm, the individual has the right to seek compensation through a civil lawsuit. This is a concrete form of preventative and repressive legal protection against the misuse of personal data.

A breach of personal data is a legal violation that has serious consequences, including civil, criminal, and administrative penalties. Generally, this violation occurs when an online lending service provider uses, disseminates, or exploits a user's personal data without proper permission or consent. According to legal concepts, every legal act committed by a legal subject will have legal consequences. These legal consequences arise from the violation of another person's rights, in this case the right to privacy and personal data protection. Therefore, an online lending provider's negligence in maintaining the confidentiality of borrower data can result in legal sanctions as a form of responsibility for the violation.

From a civil law perspective, the relationship between an online lending provider and a borrower is based on a contractual obligation, as explained by Asyhadie (2006). Borrowing and lending money is a form of contractual relationship that creates rights and obligations for both parties. Wardoyo (1992) explains that a credit agreement serves as the principal agreement, evidence of rights and obligations, and a monitoring instrument for the implementation of these obligations. Therefore, if an online loan provider violates the terms of the agreement, such as by disseminating personal data without permission, this action constitutes a breach of contract (breach of promise) and may result in an obligation to compensate.

The requirements for a valid agreement, as stipulated in Article 1320 of the Civil Code (KUHPerdata), must be met for the agreement to be considered legally valid. Online loan agreement clauses typically stipulate the rights and obligations of each party, including the provider's obligation to maintain the security and confidentiality of the borrower's personal data. However, in practice, providers often fail to fulfill these obligations properly, resulting in losses for the borrower (Setiawan, 2021). Based on Article 1365 of the Civil Code, any unlawful act that causes harm to another person requires the perpetrator to compensate for those losses. This means that borrowers who suffer losses due to the misuse of their personal data have the right to file a civil lawsuit to obtain compensation for the material and immaterial losses they suffer.

Legal protection also serves to ensure justice and legal certainty for the parties involved. According to Sinaga & Alhakim (2022), legal protection must be provided to borrowers against unilateral actions by business actors, namely online loan providers. This aligns with the opinion of Putri et al. (2024), who emphasized that consumers have the right to legal redress if their rights are violated. In this context, online loan providers have a legal responsibility to ensure customer data security and prevent misuse of personal information.

If these obligations are not met, law enforcement in the form of sanctions becomes an important instrument to create a deterrent effect and maintain public trust in the digital financial system.

When linked to the concept of legal liability in the context of consumer protection, every online loan service provider (fintech lending) is fully responsible for all losses arising from negligence in carrying out its obligations. This principle of responsibility is rooted in the principle of "caveat venditor" (let the seller beware), which means that providers, as business actors, are obliged to ensure the security, reliability, and integrity of their services for users. Therefore, if a violation, data leak, or loss occurs due to the provider's negligence, the provider can still be held legally accountable, both civilly and administratively. In the context of consumer protection law, this provision is also in line with Law Number 8 of 1999 concerning Consumer Protection, which emphasizes that business actors are obliged to be responsible for damage, pollution or losses caused by the use of traded goods and/or services.

Personal data protection, as stipulated in Law Number 27 of 2022 concerning Personal Data Protection (PDP Law), plays a crucial role in maintaining public security and privacy in the digital age, including in the use of fintech (financial technology) services. The PDP Law defines personal data as any data about an individual that can identify that individual, either directly or indirectly. In this regard, fintech service providers, including online lenders, are obliged to respect, protect, and maintain the confidentiality of user data from the collection, processing, storage, and even destruction stages. This law emphasizes that the collection and processing of personal data may only be carried out with the valid consent of the personal data owner and used in accordance with the purposes clearly communicated to the data owner.

In relation to fintech services, particularly peer-to-peer (P2P) lending, the PDP Law provides a strong legal basis for protecting borrowers' and lenders' personal data from misuse by providers. In practice, fintech companies often access various sensitive data such as identity numbers, bank account data, transaction history, and even user contact lists. If this data is misused or disseminated without permission, it constitutes a violation of the Personal Data Protection Law. Articles 39 to 57 of the Personal Data Protection Law also stipulate administrative and criminal sanctions for providers who violate them, ranging from written warnings, temporary suspension of activities, to fines and imprisonment. Thus, the Personal Data Protection Law is not only preventive but also provides a repressive mechanism to prosecute violators.

Furthermore, the Personal Data Protection Law requires fintech providers to implement the principles of accountability and data security. Providers are required to have a Data Protection Officer (DPO) responsible for ensuring that all data management processes comply with legal provisions. They must also use a reliable security system and conduct regular audits to prevent data leaks. This principle aligns with the Financial Services Authority (OJK) and the Ministry of Communication and Information Technology (Kominfo) regulations governing information technology governance in the digital financial industry.

As part of this legal responsibility, online lending providers are obliged to conduct careful credit scoring on prospective loan recipients. The prudential principle underpins this

process, ensuring that lenders ensure that disbursed funds are truly provided to those with the ability to repay the loans. The application of the "know your customer" (KYC) principle is also crucial in this regard, requiring lenders to thoroughly understand the identity and background of borrowers. This analysis encompasses various aspects such as credit scores, sources of income, agreed interest rates, and previous borrowing history. This mechanism allows lenders to objectively assess potential risks and avoid irresponsible lending practices.

Implementing this prudential principle not only aims to protect the interests of lenders but also provides legal protection for borrowers. In practice, many borrowers suffer losses due to non-transparent or even biased credit scoring systems. Therefore, lenders' responsibilities also include providing clear, transparent, and easily understandable information mechanisms for users regarding risks, repayment obligations, and personal data protection policies. This aligns with the principles of accountability and transparency, which are the foundation of healthy and equitable fintech governance.

Regarding the risk of default, fintech lending service providers also have a responsibility to anticipate and manage this risk wisely. One measure that can be taken is to provide a protection fund mechanism. The protection fund serves as a guarantee for lenders, so that in the event of a borrower's default, a portion of the losses can be covered by the fund. This step not only increases user confidence in online lending services but also demonstrates the provider's responsibility for service quality and transaction security.

The primary goal of online lending service providers is to ensure legal protection and certainty of rights for service users. If an error, negligence, or violation occurs that results in a loss for a user, the provider must be legally responsible and act in good faith to provide compensation. This principle of responsibility aligns with the spirit of consumer protection as stipulated in Law Number 8 of 1999 concerning Consumer Protection, which requires business actors to avoid harming service users.

However, to date, regulations regarding the limits and extent of service providers' responsibilities have not been explicitly stipulated in applicable regulations, particularly in POJK Number 77/POJK.01/2016 concerning Information Technology-Based Lending Services. While these provisions address service providers' obligations in technical and administrative aspects, they do not comprehensively guarantee legal protection for users in the event of data leaks or misuse of information. Therefore, future regulatory updates and refinements are needed to detail the legal responsibilities of service providers as legal entities in Indonesia. Clearer regulations will create a balance between business interests and consumer protection, as well as minimize the various legal and social risks that may arise from using online lending services.

## CONCLUSION

Based on the overall discussion, it can be concluded that legal protection of borrowers' personal data in online lending services (fintech lending) is crucial amidst the rapid development of digital technology in Indonesia. While advances in fintech have made financial access easier for the public, the risk of personal data misuse has also increased significantly. Therefore, the state has a responsibility to provide strong legal protection

through regulations that are clear, firm, and adaptable to technological developments. Personal data protection is not merely a technical issue, but also a human rights obligation, as stipulated in Law Number 39 of 1999 concerning Human Rights, which guarantees every individual's right to personal protection and privacy. Prior to the enactment of Law Number 27 of 2022 concerning Personal Data Protection (PDP Law), the legal basis for personal data protection in the context of online lending was only regulated generally through the ITE Law and POJK No. 77/POJK.01/2016 concerning Information Technology-Based Money Lending Services. However, these two regulations did not comprehensively address fintech providers' responsibilities for the management and security of user data. With the enactment of the Personal Data Protection Law, the legal position of personal data owners is now stronger. The Personal Data Protection Law grants data owners broader rights, such as the right to obtain information, the right to access, correct, and even delete their personal data, and provides a legal basis for individuals to sue in the event of a violation. This emphasizes that any collection and processing of personal data in fintech must obtain valid consent and be conducted transparently. The Personal Data Protection Law also provides a clear legal framework for fintech providers. Providers are required to apply the precautionary principle, maintain the confidentiality of users' personal data, and ensure system security from the risk of data breaches. In the event of a violation, providers can be subject to administrative and criminal sanctions as stipulated in Article 57 of the Personal Data Protection Law. These sanctions include warnings, termination of activities, administrative fines, and even imprisonment for parties who intentionally disseminate or trade personal data without permission. Therefore, the implementation of the Personal Data Protection Law provides a firmer legal basis for prosecuting any form of misuse of personal data in online lending services.

#### REFERENCES

1. Argiansyah, H. Y., & Prawira, M. R. Y. (2024). Analisis Hukum Hak Atas Privasi Dan Perlindungan Data Pribadi Berdasarkan Perspektif Hak Asasi Manusia. *Jurnal Hukum Pelita*, 5(1), 61-75.
2. Ariawan, I. G. K. (2013). Metode Penelitian Hukum Normatif. *Kertha Widya*, 1(1).
3. Asyhadie, Z. (2006). Hukum Bisnis dan Pelaksanaannya di Indonesia. *Jakarta: PT Raja Grafindo Persada*.
4. Darmayanti, E. S., & Wiraguna, S. A. (2025). Tanggung jawab hukum pinjaman online terhadap penyebaran data nasabah secara ilegal. *ALADALAH: Jurnal Politik, Sosial, Hukum dan Humaniora*, 3(2), 233-251.
5. Disemadi, H. S. (2022). Titik lemah industri keuangan fintech di Indonesia: Kajian perbandingan hukum. *Jurnal Pembangunan Hukum Indonesia*, 4(3), 471-493.
6. Disemadi, H. S., & Regent, R. (2021). Urgensi Suatu Regulasi yang Komprehensif Tentang Fintech Berbasis Pinjaman Online Sebagai Upaya Perlindungan Konsumen di Indonesia. *Jurnal Komunikasi Hukum (JKH)*, 7(2), 605-618.

7. Ibrahim, E. R. (2025). Perlindungan Hukum Bagi Penerima Pinjaman Berbasis Online (Peer To Peer Lending) Dalam Transaksi Pinjam Meminjam Uang. *Ganec Swara*, 19(1), 292-297.
8. Manurung, E. A. P., & Thalib, E. F. (2022). Tinjauan yuridis perlindungan data pribadi berdasarkan UU nomor 27 tahun 2022. *Jurnal Hukum Saraswati*, 4(2), 139-148.
9. Mutiara, U., & Maulana, R. (2020). Perlindungan Data Pribadi Sebagai Bagian Dari Hak Asasi Manusia Atas Perlindungan Diri Pribadi. *Indonesian Journal of Law and Policy Studies*, 1(1), 42-54.
10. Novendra, B., & Aulianisa, S. S. (2020). Konsep Dan Perbandingan Buy Now, Pay Later Dengan Kredit Perbankan Di Indonesia: Sebuah Keniscayaan Di Era Digital Dan Teknologi. *Jurnal Rechts Vinding: Media Pembinaan Hukum Nasional*, 9(2), 183.
11. Oemardi, A. C., & Sudiro, A. A. (2024). Peran Pemerintah Dalam Mendukung Perekonomian Masyarakat Berpenghasilan Rendah Melalui Layanan Pinjaman Online. *Binamulia Hukum*, 13(2), 345-360.
12. Pane, I. D. W., & Kansil, C. S. (2023). Tanggung Jawab Penyelenggara Pinjol Terhadap Data Pribadi Dalam Layanan Fintech. *Cakrawala Repositori IMWI*, 6(4), 1152-1161.
13. Priliasari, E. (2019). Pentingnya Perlindungan Data Pribadi Dalam Transaksi Pinjaman Online. *Majalah Hukum Nasional*, 49(2), 1-27.
14. Putri, A. S., Kirani, M., Sadi, M. F., & Setiawan, R. Q. (2024). Analisis Kewajiban dan Perlindungan Konsumen Dalam Kontrak Jual Beli. *Media Hukum Indonesia (MHI)*, 2(4), 505-514.
15. Roza, N., Azheri, B., & Hasbi, M. (2024). Perlindungan Hukum Bagi Nasabah dalam Perjanjian Pinjaman Online Berbasis Financial Technology (Fintech). *Unes Journal of Swara Justisia*, 8(3), 546-557.
16. Satria, M., & Handoyo, S. (2022). Perlindungan Hukum Terhadap Data Pribadi Pengguna Layanan Pinjaman Online Dalam Aplikasi Kreditpedia. *Journal de Facto*, 8(2), 108-121.
17. Sinaga, E. P., & Alhakim, A. (2022). Tinjauan Yuridis Terhadap Perlindungan Hukum Bagi Pengguna Jasa Pinjaman Online Ilegal Di Indonesia. *UNES Law Review*, 4(3), 283-296.
18. Tampi, M. M. (2018). Menakar Progresivitas Teknologi Finansial (Fintech) Dalam Hukum Bisnis Di Indonesia. *Era Hukum-Jurnal Ilmiah Ilmu Hukum*, 16(2).
19. Wardoyo, C. G. (1992). Sekitar Klausul-klausul Perjanjian Kredit Bank, bank dan manajemen. *Jakarta, hal*, 64-69.
20. Wijayanto, H., Muhammad, A. H., & Hariyadi, D. (2020). Analisis Penyalahgunaan Data Pribadi Dalam Aplikasi Fintech Ilegal Dengan Metode Hibrid. *Jurnal Ilmiah SINUS*, 18(1), 1-10.
21. Wiranjaya, I. D. G. A., & Ariana, I. G. P. (2016). Perlindungan hukum terhadap pelanggaran privasi konsumen dalam bertransaksi online. *Kerta Semaya*, 4(4), 3.