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Legal Protection of Customers' Personal Data in Online Loan Collection in Indonesia

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ABSTRACT

The development of online loan services in Indonesia provides easy access to financing, but it also creates legal issues regarding the protection of customers personal data, particularly during the collection process. The disproportionate use of personal data, the dissemination of information to third parties, and collection actions containing threats can harm customers privacy and security rights. This study aims to analyze the legal regulation of customers personal data protection in online loan activities in Indonesia, the forms of legal protection for personal data in the collection process, and the legal liability of operators for the misuse of customers personal data. The study employs a normative legal method with statutory and conceptual approaches. Legal materials were analyzed qualitatively by connecting applicable legal provisions with the results of previous studies published over the last five years. The results indicate that the protection of customers personal data has been strengthened through Law Number 27 of 2022 on Personal Data Protection and financial services sector regulations. Collection must be conducted lawfully, proportionally, transparently, and with respect for the customer's right to privacy. The misuse of personal data can incur legal liability for the violating parties.

Keywords: *Customers, Debt Collection, Legal Protection, Online Loans, Personal Data.*

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1. | INTRODUCTION

The development of digital technology has transformed public financial services, including loan facilities provided through information technology platforms. Online loans make it easier for the public to obtain financing without direct interaction with conventional financial institutions. However, this convenience introduces legal issues concerning the collection, use, storage, and utilization of customers personal data. Such data may include identities, telephone numbers, addresses, financial information, and other data pertaining to privacy. Priliasari (2019) emphasizes the importance of personal data protection in online loan transactions because customer data can be collected and processed in large quantities. Nurmantari and Martana (2019) also show that borrower personal data protection is a critical issue in online loan application services.

The issue becomes increasingly complex during the debt collection stage. While contractual relationships grant creditors the right to receive payments in accordance with agreed contracts, they do not bestow unlimited authority to use customers personal data. Collection methods that involve contacting third parties, broadcasting debt details, using contact data without a lawful basis, engaging in intimidation, or exerting excessive pressure can violate privacy rights. Anggitafani (2020) examines the legal protection of online loan borrowers' personal data from the perspectives of financial sector consumer protection and public interest (*maslahah*). Anggriawan (2020) discusses legal protections for debtors who face threats in online loan agreements, highlighting the need to restrict creditors' actions during collection.

Personal data protection also carries a public law dimension. Kesuma et al. (2021) demonstrate that consumer personal data security forms a crucial part of financial technology-based electronic transactions. Hanifawati (2021) highlights the urgency of law enforcement against illegal online lending practices alongside personal data protection. Satria and Handoyo (2022) indicate the need for legal safeguards against the unauthorized use and misuse of personal data within online lending applications. Kurniawati and Yunanto (2022) frame the misuse of debtor personal data as a legal problem that requires protection for weaker parties.

Regulatory developments reflect a strengthening of personal data protection in Indonesia. Prior to specific legislation, personal information protection in electronic systems was grounded, among other sources, in Law Number 11 of 2008 on Information and Electronic Transactions as amended multiple times, most recently by Law Number 1 of 2024. These provisions provided a base for protecting personal information processed electronically. The financial services sector also maintains consumer protection provisions mandating that operators deliver safe, transparent, and responsible services.

A more comprehensive framework arrived with Law Number 27 of 2022 on Personal Data Protection, which establishes foundational rules for personal data processing, including data subject rights, obligations of controllers and processors, and prohibitions against unlawful data use. Lathifah and Maulani (2023) examine online loan consumer personal data protection under Law Number 27 of 2022. Nurani et al. (2023) emphasize the importance of consumer protection against data leaks and management failures in online loan services. Guntara et al. (2023) discuss legal protections for customers suffering losses from illegal online loan transactions under the Electronic Information and Transactions Law.

In practice, data misuse remains a significant concern because technological advances often outpace the legal understanding and compliance of certain business operators. Khotimah and Yazid (2023) evaluate legal protections for online loan customer data through legal and religious fatwa perspectives. Wafda (2023) discusses personal data misuse in online loan applications, while Syifa and Adam (2024) analyze legal protections for customer personal data within the OVO application. Ichsandi and Silalahi (2024) affirm the urgency of data protection in digital banking, while Hendarto (2024) shows that minimal privacy protections negatively impact customer data security. Rizki (2024) discusses legal protection for customers in online loan transactions from an Islamic economic law perspective.

These issues are highly relevant because personal data protection impacts information security and sets boundary limits on operator authority during debt collection. Abrianti et al. (2024) show that online loan developments yield diverse social impacts across communities. Ananto et al. (2024) highlight the practices of illegal financial entities operating outside Financial Services Authority (OJK) oversight, underlining the necessity of supervising digital finance operators. Therefore, legal analysis of customer personal data protection must cover data collection, contractual usage, debt collection, and legal liability for misuse.

Based on these points, this study addresses three research questions RQ1: How is the legal protection of customers personal data regulated in online loan activities in Indonesia? RQ2: What forms of legal protection apply to personal data during the debt collection process? RQ3: What is the legal liability of operators for personal data misuse during debt collection activities? These questions structure the analysis connecting personal data protection, debt collection authority, customer rights, and legal liabilities under Indonesian legislation.

2. | RESEARCH METHOD

This study employs a normative legal research method (yuridis normatif) because it focuses on examining the legal norms governing customer personal data protection and debt collection practices in online loan services. Rather than measuring customer behavior or conducting empirical surveys, the research analyzes statutory provisions, legal principles, data protection concepts, and the interrelationship among regulations governing online lending activities. This approach is intended to assess the adequacy of the existing legal framework in protecting consumers while ensuring legal certainty for financial technology service providers.

The research combines a statutory approach and a conceptual approach. The statutory approach examines legislation related to personal data protection, electronic transactions, consumer protection, the financial services sector, and information technology-based joint funding services. The primary legal instruments analyzed include Law Number 27 of 2022 on Personal Data Protection (PDP Law), Law Number 1 of 2024 concerning the Second Amendment to Law Number 11 of 2008 on Information and Electronic Transactions (ITE Law), Law Number 4 of 2023 on Financial Sector Development and Strengthening (PPSK Law), Financial Services Authority Regulation (POJK) Number 22 of 2023 on Consumer and Public Protection in the Financial Services Sector, and POJK Number 40 of 2024 on Information Technology-Based Joint Funding Services (LPBBTI). Particular attention is given to provisions governing data subject rights, lawful data processing, obligations of data controllers and processors, prohibited conduct, administrative and criminal sanctions, and dispute resolution mechanisms.

The study relies on primary legal materials consisting of statutes and regulations, while secondary legal materials include academic journal articles, scholarly books, and recent legal research published within the last five years. All legal materials are analyzed qualitatively through the identification and interpretation of legal norms, comparison of statutory provisions, and integration of relevant legal doctrines concerning personal data and consumer protection. Based on this analysis, the research formulates prescriptive conclusions regarding the scope of legal protection that should be afforded to online loan customers and the legal boundaries governing lawful debt collection practices in Indonesia.

3. | RESULTS AND DISCUSSION

Legal Regulation of Customer Personal Data Protection in Online Loan Activities in Indonesia

Legal protection for customer personal data in Indonesian online loan activities is constructed through multi-layered regulations that have evolved alongside fintech growth. Personal data plays an essential role during registration, identity verification, credit scoring, contract execution, and collection processes. Consequently, online loan operators gain access to private information, necessitating a clear legal framework governing collection, use, storage, disclosure, and security. Priliasari (2019) stresses the importance of data protection in online loans due to digital service characteristics that enable widespread data harvesting. Nurmantari and Martana (2019) also demonstrate that borrower data protection forms a vital part of the legal relationship between application users and operators.

Before specific personal data protection laws were enacted, information protection in electronic transactions relied primarily on Law Number 11 of 2008 on Information and Electronic Transactions, as amended most recently by Law Number 1 of 2024. These statutes established basic protections for electronic personal data usage, establishing that data processing requires party consent and providing recourse for injured parties. Guntara et al. (2023) show that legal protection for online loan customers particularly involving illegal operators can be linked to ITE Law provisions when technology usage causes harm.

Legal protections expanded substantially with the enactment of Law Number 27 of 2022 on Personal Data Protection (PDP Law). This statute provides a comprehensive framework covering data subject rights, obligations of data controllers and processors, lawful bases for processing, data security, and violation liabilities. In online loans, customers act as data subjects, while operators who determine processing purposes and execute data processing must comply with statutory obligations. Lathifah and Maulani (2023) show that Law No. 27 of 2022 serves as a pivotal foundation for safeguarding online loan consumers' personal data.

Data protection regulations also intersect with financial sector legislation. Law Number 4 of 2023 on Financial Sector Development and Strengthening reinforces financial supervision frameworks and consumer protection standards. Modern financial regulations increasingly emphasize governance and consumer safety within digital services. Protecting customer data is therefore not merely a private contractual matter between creditor and debtor, but a regulatory duty incumbent upon financial sector operators. The urgency of data protection is further heightened because financial digitalization assigns both economic value and high misuse risks to customer data. Ichsandi and Silalahi (2024) highlight the urgency of personal data protection in digital banking. Although focused on banking, their insights apply directly to online lending as both sectors rely on digital tech to gather and manage user data. Hendarto (2024) similarly shows that minimal privacy safeguards create vulnerabilities in digital financial services.

Furthermore, consumer protection is inextricably linked to data protection. As service users, customers have the right to clear, accurate, and transparent information regarding how their data is used. Power imbalances between operators and customers often leave customers vulnerable, especially since all transactions take place through electronic systems. Abrianti et al. (2024) show that online loans yield varying societal impacts, requiring operations to be coupled with robust user protections. Based on this analysis, RQ1 is answered the legal framework protecting customer personal data in Indonesian online lending is multi-layered and increasingly comprehensive. It encompasses the PDP Law, the ITE Law, financial sector frameworks, and OJK regulations. Customer personal data cannot be treated as freely usable information by operators; it must be processed based on lawful grounds, explicit purposes, and strict security duties. While regulatory frameworks have grown stronger, protection effectiveness ultimately depends on operator compliance, regulatory oversight, and law enforcement against violations.

Forms of Legal Protection for Customer Personal Data in Online Loan Collection

Debt collection forms part of the legal execution of a loan agreement. Creditors possess the legal right to receive agreed payments. However, the right to collect debt does not grant unlimited authority to exploit all customer personal data. Data usage during collection must respect privacy rights, data security, consumer protection, and statutory rules. A clear legal boundary exists between legitimate collection practices and collection methods that unlawfully misuse personal data.

Anggriawan (2020) indicates that online debt relationships yield legal problems when creditors threaten debtors, showing that payment obligations cannot justify all collection tactics. Wahyudi (2022) discusses legal protections for customers whose data is leaked or misused by illegal online lenders. Data dissemination inflicts psychological and social distress on customers by revealing debt details to third parties who have no legal connection to the loan agreement. From a personal data protection perspective, data usage during collection must possess a lawful basis and align with designated processing purposes. Data collected during registration and application cannot be freely repurposed for unrelated matters. Utilizing contact lists to contact family, friends, coworkers, or third parties must strictly respect processing bases and authority limits. Disclosing debt information to uninvolved third parties potentially violates privacy rights and core data protection principles.

Kurniawati and Yunanto (2022) note that debtor data misuse in online lending requires legal remedies because debtors occupy vulnerable positions against unauthorized data processing. Satria and Handoyo (2022) reinforce the need for legal safeguards surrounding stored application data. Thus, legal protection during collection must encompass data access restrictions, data usage limitations, and mandatory data confidentiality safeguards. Complexity increases when collection is outsourced to third parties. While operators may engage third-party collectors under applicable regulations, delegating collection functions does not shift data protection duties entirely onto the third party. Third parties accessing customer data remain restricted to using that data strictly for legitimate collection purposes. Operators must ensure proper supervision and access controls when sharing data with collection agents.

Nurani et al. (2023) emphasize optimizing consumer protections against data leaks and mismanagement in online loans. Such safeguards are vital because leaks expose personal information to unauthorized parties. Lathifah and Maulani (2023) also confirm that Law No. 27 of 2022 offers a crucial foundation for protecting online loan consumer data. Forms of data misuse during collection include: using contact lists to pressure debtors, broadcasting debt details via electronic messages or social media, disclosing debtor identities to uninvolved third parties, and using data for intimidation. In illegal online lending, these risks escalate because operators lack legal legitimacy. Hanifawati (2021) stresses the importance of enforcing criminal law against illegal P2P lending while protecting personal data. Ananto et al. (2024) similarly highlight the necessity of monitoring illegal financial entities operating outside official regulatory oversight. Syifa and Adam (2024) confirm that personal data protection remains a central concern in online loan operations. In a broader context, Ichsandi and Silalahi (2024) show that digital finance expansion elevates the urgency of data protection. Meeting these protection needs does not eliminate a creditor's right to collect debts; rather, it establishes boundaries so collection remains professional and lawful.

Accordingly, the answer to RQ2 is that legal protection for customer personal data during debt collection is provided through data usage restrictions, data security and confidentiality duties, access limits for authorized personnel, usage transparency, and explicit prohibitions against using data for pressure or intimidation. Collection remains a creditor's right, but execution must never involve broadcasting personal data, disclosing debt details to uninvolved third parties, making threats, or employing methods that degrade human dignity and violate privacy.

Legal Liability of Online Loan Operators for Personal Data Misuse in Collection Activities

Misusing personal data during debt collection can trigger legal liability for both operators and collecting agents. This liability spans civil, administrative, and criminal dimensions depending on the nature of the act, violated rules, the relationship between actor and operator, and the damages suffered by the customer. Under civil law, unauthorized data usage that causes harm provides grounds for tort claims (*perbuatan melawan hukum*) or breach of contract claims. The legal relationship between customer and operator creates not only payment duties for the customer, but also legal obligations for the operator to deliver services lawfully. Operators cannot cite contractual clauses to justify data usage that violates statutory provisions.

Under administrative law, operators failing to fulfill data protection duties face administrative sanctions under applicable regulations. Law Number 27 of 2022 sets clear liability parameters for data processing activities. Processors must ensure data is processed under lawful bases, explicit purposes, and adequate security measures. Violations trigger legal consequences scaled to the nature and severity of the breach. Guntara et al. (2023) show that online loan disputes can trigger ITE Law provisions if technology usage inflicts losses on users. When collection data misuse involves threats, extortion, or other criminal acts, the matter escalates from a data protection infraction into a criminal offense. Liability assessments consider concrete collection actions alongside operator status.

Regarding customer interests, Khotimah and Yazid (2023) frame online loan customer data protection as part of broader legal protections for service users. Rizki (2024) shows that customer protection in fintech can be analyzed through Islamic economic law, which emphasizes protecting the welfare and interests of contracting parties. This perspective reinforces that financing relationships must not produce unfair harm to either party. Legal liability does not automatically disappear when collection is outsourced to third parties. When operators grant customer data access to third-party collection firms or individuals, operators retain the duty to ensure data is used solely for legitimate purposes. Third-party partnerships must include access limits, security mechanisms, oversight, and clear liability allocations. Third parties are equally prohibited from using customer data outside lawful collection activities.

Hendarto (2024) indicates that privacy issues arise when legal rules fail to set sufficient boundaries on data usage. Operators must treat data protection as a core service governance component rather than a mere administrative formality. Abrianti et al. (2024) also emphasize that because online lending impacts communities differently, user protection must be integral to service operations.

From a normative analysis, six core principles govern operator liability. Data processing must possess a lawful basis. Data must be used strictly in accordance with stated processing purposes. Data access must be restricted to authorized parties. Operators must maintain data security and confidentiality. Collection activities must be conducted professionally without using personal data as an intimidation tool. Effective complaint and dispute resolution mechanisms must be available to customers when violations occur. Thus, RQ3 is answered: online loan operators and or collection agents can be held legally liable administratively, civilly, or criminally for misusing customer personal data during debt collection. Outsourcing collection functions to third parties does not relieve operators of their underlying duty to safeguard customer data.

The three research questions confirm that the legality of an online loan contract does not grant carte blanche over personal data. Customers remain obligated to repay lawfully contracted debts, and creditors retain collection rights. However, exercising collection rights is bounded by privacy rights and data protection laws. Balancing collection rights with data protection requires lawful processing grounds, explicit purposes, proportional usage, robust security, and effective liability enforcement. Personal data protection must be an integral component of online loan operations oriented toward legal certainty, justice, and consumer protection.

4. | CONCLUSION

Legal protection for customers personal data during online loan collection in Indonesia has been strengthened through regulatory developments across personal data, electronic transactions, financial services, and IT-based joint funding services. Results from this normative legal study show that customer personal data is not mere administrative data, but part of protected personal rights. The existence of a debt obligation does not negate a customer's rights to privacy, security, and lawful data processing. Law Number 27 of 2022 on Personal Data Protection serves as the primary basis governing data subject rights, processing rules, controller/processor duties, prohibitions, sanctions, and dispute resolution. This protection is reinforced by Law Number 1 of 2024 (Second Amendment to the ITE Law), Law Number 4 of 2023 (PPSK Law), POJK Number 22 of 2023, and POJK Number 40 of 2024 (LPBBTI). Debt collection remains legally permissible when grounded in contractual relationships and regulatory standards. However, collection must never involve threats, violence, defamation, data dissemination, or contacting third parties to humiliate debtors. Personal data usage must be restricted to legitimate, transparent, proportional, and accountable purposes. Operators must ensure that both internal and third-party collection activities comply fully with personal data protection and consumer protection rules. Effective legal protection requires integrated enforcement combining data protection, consumer safety, OJK supervision, and law enforcement. Operators must secure data from collection through destruction, including during third-party collection engagements. Customers possess clear legal grounds to seek protection and utilize complaint or dispute resolution mechanisms if their data is misused.

This study has limitations. First, its normative legal method focuses on statutory provisions, legal principles, and literature without empirically testing field experiences of customers or collectors. Second, the lack of interviews with customers, operators, collectors, or regulators means direct compliance levels could not be measured. Third, the dynamic nature of online lending regulations and tech practices necessitates continuous updates to keep pace with policy and technology shifts. Implications suggest that online loan operators must strengthen data governance across all financing stages, particularly collection. Integrating data minimization, purpose limitation, information security, transparency, and third-party oversight into standard operating procedures is essential. For the OJK and related bodies, these findings support strengthening supervision, complaint handling, and enforcement against privacy-violating collection tactics. For customers, this study affirms that debt payment duties do not waive rights to data protection and dignified treatment. Future research should complement normative approaches with empirical studies evaluating real-world personal data compliance in debt collection. Empirical research could engage customers, LPBBTI operators, collection agencies, and regulators through interviews or surveys. Furthermore, future studies could evaluate sanction effectiveness, operator vicarious liability for third parties, and the evolution of customer dispute mechanisms to provide a complete picture of data protection gaps in Indonesian online lending.

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The authors declare no conflict of interest.

Ethical Approval and Originality Statement

Ethical approval was obtained for this study. The manuscript represents original work and has not been previously published, nor is it under consideration by another journal.

Data Disclosure Statement

The data that support the findings of this study are available from the corresponding author upon reasonable request.

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