

LEGAL PROTECTION FOR E-WALLET CONSUMERS IN THE DIGITAL ECONOMY ERA

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ABSTRACT

The era of digitalization seems to have influenced almost all human activities, including digital banking. By using electronic means, banks can now provide financial services to their customers without going through a physical office. Even today, digital-based financial services are presenting an electronic wallet/e-wallet. An E-wallet is a software-based product that uses internet signal, and Indonesia is starting to recognize it as a digital payment instrument. Implementing electronic money activities reduces cash circulation, referred to as a less-cash society, and makes payment efficient. In general, an e-wallet is an application based on a server, and using it requires a connection with the publisher first. However, the emergence of various kinds of e-wallets at this time is not a solution to reduce the problem but creates complaints on the usage. The current free-market era creates market competition and causes many business actors to only care about profit. Business actors mostly ignore the interests of consumers. Based on this condition, this research intends to deeply examine the legal protection form for e-wallet consumers in Indonesia. This study will use normative/doctrinal legal research methods to answer the existing problems. According to the Indonesian Consumer Protection Law, every e-wallet consumer has the right to get legal protection as a sense of security in making transactions. Consumers of e-wallets who received non-conformance services can sue for their losses legally through court or out of court under the Indonesian Consumer Protection Law provisions.

Keywords : *Electronic Wallet, Electronic Money, Legal Protection*

A. INTRODUCTION

Along with the global rapid development of technology, the pace of the digital technology-based economy has also begun to emerge and develop.¹ The presence of this digital economy provides opportunities for innovation, entrepreneurship, and the country's economic growth.² In addition, the digital economy facilitates one's activities, such as shopping using the e-commerce market, making time more efficient and effective during busy days.³ The era of digitalization seems to have entered into almost all human activities; one of the proofs is digital banking. By using electronic means, banks can now

provide financial services to their customers without going through a physical office. Banking services are essential in the economic development of a country.⁴ Banking has at least two goals. First, as a service provider of efficient payment mechanisms and instruments for customers; second, is to accept savings from customers and lend them to those who need funds, which means that banks can increase the flow of funds for more productive investment and utilization.⁵ The demand for banking digitalization is also reinforced by the shift in business ownership which is currently dominated by the millennial generation, who prefers online transactions through digital platforms.⁶

1 Stevani, W., & Disemadi, H. S. (2021). Urgency of Cryptocurrency Regulation in Indonesia: The Preventive Action for Ransomware Crime. *Hang Tuah Law Journal*, 5(1), 52-66.

2 Rosadi, S. D., & Pratama, G. G. (2018). Urgensi Perlindungan data Privasi dalam Era Ekonomi Digital Di Indonesia. *Veritas et Justitia*, 4(1), 88-110.

3 Clevalda, D. K., & Kharisma, D. B. (2019). Perlindungan Hukum Terhadap Nasabah Dompot Digital Oleh Bank Indonesia. *Jurnal Privat Law*, 9(1), 1-9.

4 Tarigan, H. A. A. B., & Paulus, D. H. (2019). Perlindungan Hukum Terhadap Nasabah Atas Penyelenggaraan Layanan Perbankan Digital. *Jurnal Pembangunan Hukum Indonesia*, 1(3), 294-307.

5 Kholis, N. (2018). Perbankan Dalam Era Baru Digital. *Economicus*, 12(1), 80-88.

6 Amrillah, M. U. (2020). Urgensi Pembentukan Undang-Undang Digital Banking Bagi Perbankan Syariah Di Indonesia. *Lex Renaissance*, 5(4), 928-945.

Nowadays, banking services cannot be separated from technology or the internet. Banks only used the internet for some facilities in the past, such as making transfers or checking accounts. However, its administration still occurred at the relevant bank office, such as opening a new account or closing an account. As time goes by, more and more banks are improving online services and even migrating completely to internet services. More digital banks are popping up, whether they are new outputs from conventional or fully digital banks. Digital banking results from the development of SMS (Short Message Service) banking or mobile banking and the current financial technology development (fintech).⁷ Fintech is a technological innovation developed in the financial sector to practically, efficiently, and effectively carry out financial transactions.⁸

Like the name, digital banking is entirely carried out digitally or via the internet, starting from the initial opening of a savings account to closing. It can be done online without going to the appropriate bank office. The Indonesian Financial Services Authority Regulation Number 12/PJOK.03/2021 concerning Commercial Banks states that a digital bank is an Indonesian legal entity that provides and carries out business activities, primarily through electronic channels without a physical office other than the head office or using a limited physical office. Then according to the Indonesian Financial Services Authority Regulation Number 12/POJK.03/2018, concerning the Implementation of Digital Banking Services by Commercial Banks, digital banking is defined as an electronic banking service developed by optimizing customer data to serve customers quickly, efficiently, and under the needs (customer experience). It can be carried out entirely independently by customers, considering security aspects.

The banking industry continues to innovate and adapt to provide the best service for the community. One of the efforts made is digital transformation to improve service quality.⁹ The existence of digital transformation has also made more banks establish themselves as digital banks. Through digital transformation, it is hoped that banks can reach more young customers. Digital opportunities and increasing digital behavior drive digital transformation in the banking sector. Indonesia is a country that has great potential due to the high growth of e-commerce. This indicator of digital behavior consists of ownership of devices such as cellphones and laptops and time to access the internet per day. These technological developments influence the banking world, such as the relationship between banks and customers, which will be genuinely individualized customer-centered banking. As a result, the connectivity eases customers to access banking services through devices and no longer focus on financial products but on contextual financial services that adapt to the lifestyle and needs of today's customers.¹⁰

Digital banking enthusiasts in Indonesia are increasing because people feel that the services are more complete and practical than conventional banks. The birth of innovation supports the progress of the digital economy in Indonesia in digital financial services in the form of an 'e-wallet' or digital wallet, which is currently proliferating in society. An E-wallet is a financial service innovation with a cashless or non-cash method to facilitate offline and online payments.¹¹ Marc Hollander explained that an e-wallet is a software-based product that uses an internet signal. Indonesia is starting to recognize that an e-wallet is a digital payment instrument that uses electronic media in a server-based way. The positive impact of implementing electronic money activities is the reduction in cash circulation, referred to as a less-cash society,

7 Dubey, V. (2019). FinTech innovations in digital banking. *International Journal of Engineering Research & Technology (IJERT)*, 8(10), 597-601.

8 Sudirman, L., & Disemadi, H. S. (2022). Legal Protection for Borrowers and Business Dispute Resolution in Fintech Lending Services. *Jurnal Jurisprudence*, 11(2), 187-204.

9 Amrillah, M. U. (2020). *Op.Cit.*

10 Kornelis, Y. (2022). Digital Banking Consumer Protection: Developments & Challenges. *Jurnal Komunikasi Hukum (JKH)*, 8(1), 378-394.

11 Cevalda, D. K., & Kharisma, D. B. (2019). *Op.Cit.*



and its efficiency as a means of payment. In general, an e-wallet is an application based on a server, and using it requires a connection with the publisher first.¹² Article 1 number 7 of Bank Indonesia Regulation number 18/40/PBI/2016 concerning the Implementation of Payment Transaction Processing, states that an e-wallet is an electronic service for storing payment instrument data, among other means of payment using cards or electronic money, which can also accommodate funds, to make payments. An e-wallet is an electronic device, service, or even an application that allows users to make online transactions to buy goods or services.¹³ A digital wallet or e-wallet is an electronic service that plays a role in the data storage process and is a payment instrument. An E-wallet is an alternative payment system created to make it easier for users to make transactions.¹⁴ It is also a means of transacting that is very influential in the developing the digital economy. It is easier for people to transact through digital technology, especially when transacting with people who are far away. The existence of digital technology is an opportunity for a business actor to trade his services and conduct the business competition.¹⁵

The emergence of various kinds of e-wallets at this time is not a solution to reduce the problem but adds to the existing complaints in the community related to its use. In today's free-market era, there is market competition, so many business actors

only care about profit and ignore the interests of consumers. One of the problems that are often complained about is that e-wallet parties often ignore the rights that users should obtain. In this case, there is a delay, and it is often found that consumers do not receive compensation.¹⁶ Article 7 letter g of Indonesian Law Number 8 of 1999 concerning Consumer Protection (Indonesian Consumer Protection Law) regulates the duties of business actors in terms of when to provide compensation to users. In addition, the problems that emerge between consumers and providers are usually due to a mismatch of information between both parties. The agreement or service offered is different from what is received. As the party offering the products and services, the Operator does not provide detailed explanations to customers regarding the products and services provided.¹⁷ Based on the description above, this study aims to analyze the legal rules related to e-wallets and analyze the form of legal protection given to consumers in using e-wallets.

B. RESEARCH METHOD

This study focuses on the study of legal protection for consumers of e-wallet from an Indonesian legal perspective. This research is doctrinal law research or normative legal research. The nature of the research conducted is descriptive research. The types of data used are secondary and primary data as additional data obtained through many information on facts directly obtained from research. Secondary data were obtained through a literature study, while primary data as additional data was obtained both by observation and interviews with respondents. The secondary data used are grouped into 3 (three) legal materials, namely primary legal materials, secondary legal materials, and tertiary legal materials. Primary materials are legal materials that are binding and underlying such as legislation, and secondary legal materials provide explanations of primary legal materials, such as journals and books. The tertiary legal materials are legal materials that explain other

12 Inggiharti, N. (2020). Pengaruh Electronic Wallet terhadap Kegiatan Keuangan Indonesia (Perbandingan Aplikasi Electronic Wallet Milik Perusahaan Financial Technology terhadap Aplikasi Electronic Wallet milik BUMN). *University of Bengkulu Law Journal*, 5(1), 74-88.

13 Nawawi, H. H. (2020). Penggunaan E-wallet di Kalangan Mahasiswa. *Emik*, 3(2), 189-205.

14 Bodhi, S., & Tan, D. (2022). Keamanan Data Pribadi Dalam Sistem Pembayaran E-Wallet Terhadap Ancaman Penipuan Dan Pengelabuan (Cybercrime). *UNES Law Review*, 4(3), 297-308.

15 Naomi, F. P., & Priyanto, I. M. D. (2020). Perlindungan Hukum Pengguna E-Wallet Dana Ditinjau Dari Undang-Undang Perlindungan Konsumen. *Kertha Semaya: Journal Ilmu Hukum*, 9(1), 24-33.

16 Naomi, F. P., & Priyanto, I. M. D. (2020). *Ibid.*

17 Cevalda, D. K., & Kharisma, D. B. (2019). *Op.Cit.*

legal materials such as dictionaries and articles on internet sites. The data analysis technique used in this legal research is qualitative data analysis techniques. This technique systematically describes the data obtained from the research results in sentences to describe the problem clearly and get the proper conclusion.

C. DISCUSSION

Electronic money or e-money is a means of payment issued by state authorities through a provider institution whose money is stored in electronic form on storage media such as servers or chips.¹⁸ E-money is included as a legal means of payment and is recognized by the state, so it must not be refused in making payment transactions in Indonesia.¹⁹ Indonesian Information and Electronic Transaction Law (In Indonesia: *UU ITE/Informasi dan Transaksi Elektronik*) and electronic money are related because they are within the scope of electronic transactions. According to Article 1, number 2 of the *ITE Law*, electronic transactions are legal acts using computers, computer networks, and other electronic media. Based on the article, exchanging information carried out through an electronic network is called an electronic transaction. Another concept of electronic money, when associated with conventional concepts, is a wallet, which means that if the money is digital, so is the wallet.

Recently, e-wallet services have emerged and become a trend in Indonesia due to the increasing use of the internet and smartphones connected to e-wallets in the payment system. The use of e-wallets greatly facilitates transactions, especially when there are restrictions on the use of cash during this pandemic. Even though there is no valid information about cash as a transmission medium for COVID-19, people still see physical money as one way to spread this

virus, making people switch to digital payments. By using an e-wallet, people can make transactions by scanning a QR code (Quick Response) without using cash. The QR payment system is currently popular because it is efficient and easy to use. In general, QR payments on e-wallets are an innovative way that makes it easy to operate the system. QR codes have advantages in storage and speed of accurate data collection, and physical utility that lasts a long time. Bank Indonesia has standardized QR codes when using payment methods, given the benefits and effectiveness of QR codes. QRIS (Quick Response Code Indonesia Standard) is a standard QR code in the Indonesian payment system. QRIS is a product of Bank Indonesia developed with the Indonesian Payment System Association (In Indonesia: *ASPI/Asosiasi Sistem Pembayaran Indonesia*) in the context of implementing the National Payment Gateway (In Indonesia: *GPN/Gerbang Pembayaran Nasional*), which was officially implemented on January 1, 2020.²⁰

Electronic money or e-money as a non-cash payment method²¹ has created a digital wallet in Indonesia, which has several differences from e-money, even though digital wallets are part of e-money. The first difference is the shape. E-money is in the form of a chip embedded in a card or other media or uses a chip-based. Meanwhile, digital wallets or e-wallets are in the form of electronic money on a server or server-based, so they must first be connected to the issuing server. The second difference is in the range of use of the two. Electronic money, generally in the cards, is used in daily transactions. For example, to pay for toll roads, pay for public transportation tickets, purchases at retail outlets, and pay for tickets to tourist attractions. Meanwhile, digital wallets are used for online and offline shopping, paying electricity tokens, Assurance bills, cable TV bills, etc. The third

18 Candrawati, N. N. A. (2014). Perlindungan hukum terhadap pemegang kartu e-money sebagai alat pembayaran dalam transaksi komersial. *Jurnal Magister Hukum Udayana*, 3(1), 441-444.

19 Situngkir, R. (2018). Penggunaan E-Money Berdasarkan Undang-Undang Nomor 7 Tahun 2011 Tentang Mata Uang. *De Lega Lata: Jurnal Ilmu Hukum*, 3(1), 52-59.

20 Bodhi, S., & Tan, D. (2022). *Op.Cit.*

21 Ramadhan, H., & Aminah, S. (2016). Perlindungan Hukum Terhadap Pengguna Uang Elektronik Dalam Melakukan Transaksi Ditinjau Dari Peraturan Bank Indonesia Nomor 16/8/pbi/2014 Tentang Uang Elektronik (E-money). *Diponegoro Law Journal*, 5(2), 1-18.



difference is in the maximum balance amount between the two. In e-money, people can only top up a maximum balance of Rp. 1,000,000 million. As for digital wallets, the maximum balance can reach Rp. 10,000,000. However, e-money and e-wallets can be refilled at EDC machines, ATMs, internet banking, mobile banking, and retail outlets. The fourth difference between electronic money and digital wallets is their security features. E-money does not have security features to be used easily by others. However, in an e-wallet, there are security features in the activation of the user's mobile number and pin.

Payments using QRIS in an e-wallet application are more convenient and faster than conventional payments because they save time and money. Server-based payment systems are widely used for transactions and payments made through smartphone applications because users consider this payment method to be profitable. Payments using an e-wallet provide a level of convenience and speed and provide promos or transaction discounts.²² Apart from these advantages, legal protection in e-wallets needs to be considered carefully because this electronic wallet has a broad role, function, and influence. Digital developments in the future will develop more rapidly so that there should be no negligence and omission of violations. It is necessary to conduct a more profound study so that cases of losses experienced by users do not reoccur and even become massive.²³

1. E-Wallet Regulation in Indonesia

E-wallet users often inflict losses, either directly (materially) or immaterially. The direct loss that mostly happens is the deducting of balance in the e-wallet account or bank account (The application says "successful," but the service has not been appropriately implemented while the money in the e-wallet balance has been deducted). The immaterial losses can be feelings of disappointment and discomfort due to the slow service that wastes the user's time. In return, it will reduce trust and interest.

22 Bodhi, S., & Tan, D. (2022). *Op.Cit.*

23 Naomi, F. P., & Priyanto, I. M. D. (2020). *Op.Cit.*

Because of this, the implementation of the Consumer Protection Law is very much needed by consumers, especially e-wallet parties, so that in the future, they can guarantee legal certainty to consumers whose rights have been harmed.²⁴ Every Indonesian society has the same status in the eyes of the law without distinguishing one individual from another. Every Indonesian society has the same obligations and rights in legal arrangements. The 1945 Constitution of the Republic of Indonesia Article 1 paragraph 3 stipulates the obligation of the state to guarantee the legal rights of every citizen. As someone who has the value of legal subjects, every human being has the right to get recognition of his human rights. It means that a consumer is also a person with the value of a legal subject who is entitled to receive his rights in an unwanted event.

This e-wallet consumer legal protection needs to be carefully considered because e-wallets have a broad role, function, and influence. The development of the digital economy will undoubtedly develop more rapidly, so there should be no negligence, such as allowing violations to happen. It needs to be studied more deeply so that cases of losses experienced by users do not reoccur and even become massive. The Indonesian Consumer Protection Law already protects consumers. Wherein essence, electronic wallet users have the right to get legal protection if they experience losses in various forms, both goods and services promised in the features of e-wallet. Furthermore, the agreement between the e-wallet and the consumers is stated in the terms and conditions of the e-wallet.²⁵

In Indonesia, the regulation of e-wallets is stated in Bank Indonesia Regulation Number 18/40/PBI/2016 concerning the Implementation of Payment Transaction Processing. Article 1, number 7 of this regulation states that an Electronic wallet is an electronic service for storing data on payment instruments such as payments using cards or electronic money, which can also

24 Naomi, F. P., & Priyanto, I. M. D. (2020). *Op.Cit.*

25 Tan, K., & Disemadi, H. S. (2021). Urgency of Electronic Wallet Regulation in Indonesia. *Nagari Law Review*, 5(1), 1-14.

accommodate funds, to make payments. This provision was formulated considering: (1) The development of technology and information systems continues to give birth to various innovations, especially those related to financial technology (fintech), in order to meet the needs of the community, including in the field of payment system services, both in terms of instruments, service providers, mechanism, and infrastructure for the implementation of payment transaction processing; (2) The innovation in implementing the payment transaction needs to support a smooth, safe, efficient, and reliable payment system continuously. That is why it is necessary to regulate payment system service providers to complement the existing provisions by prioritizing the fulfillment of prudential principles, adequate risk management, and with due regard to the expansion of access, national interests, and consumer protection, including international standards and practices; (3) In order to increase the resilience and competitiveness of the national payment system industry, Bank Indonesia needs to encourage the role of domestic players, among others, through restructuring the ownership structure of payment system service providers; and (4) The arrangements of payment system services in the current provisions need to be completed and formulated more comprehensively to provide more explicit directions and guidelines to payment system service providers, payment transaction support providers, and the public.

Based on these considerations, Bank Indonesia shall establish and stipulate a Bank Indonesia Regulation concerning the Implementation of Payment Transaction Processing which also contains regulations on e-wallets.

Article 1 number 11 of Bank Indonesia Regulation (In Indonesia: *PBI/Peraturan Bank Indonesia*) number 18/40/PBI/2016 emphasizes that the e-wallet operator is a Bank or Non-Bank Institution that organizes an e-wallet. The party that intends to get a license to become an e-wallet operator must be a Bank or Non-Bank Institution following the provisions of Article 7 *PBI* number 18/40/PBI/2016. In addition, the party that will become the e-wallet operator must meet the requirements

of the feasibility aspect as a Payment System Service Provider. Those requirements include legality and company profile; law; operational readiness; system security and reliability; business worthed; adequacy of risk management; and consumer protection. Referring to the last requirement, legal protection for e-wallet consumers can be realized with a clear and firm legal guideline. In the future, it is expected to be able to prevent losses from occurring. The government is also expected to participate in monitoring. Satijipto Raharjo has also argued to support this concept, where the community is supported to obtain their rights through legal protection as evidence of protecting our human rights. With this economic system's progress, there will be a transformation in the relationship between producers and consumers. In return, a healthier economy will be created. It is hoped that the relationship initially based on the caveat emptor principle will now also have to metamorphose into a caveat vendor gradually. That is, producers are expected to have the awareness to protect consumers.

2. E-Wallet Consumer Protection in the Digital Economy Era

Technological transformation is unavoidable, and every person or institution must adapt to the situation. It will result in a complex situation that requires new capabilities based on technological capabilities and supporting regulations to accommodate these activities. Due to the new variables such as technology, it is undeniable that crime will increase and become more sophisticated.²⁶

People generally use the money to make payments or services. Therefore, money has become an essential economic instrument. In general, people save money or funds in banks to make a profit. Along with today's developments, financial technology (fintech) makes innovations to the payment system through electronic mechanisms. The rapid development of technology makes it

26 Anrova, Y., & Sembiring, A. (2022). Peran Lembaga Penjamin Simpanan Terhadap Saldo Uang Elektronik Pada Dompot Elektronik Dana. *Res Justitia: Jurnal Ilmu Hukum*, 2(1), 149-161.



easier for people to develop more flexible innovations in conducting transactions. It gives the community more value in making payments that have changed from the conventional 'face to face' form based on paper documents to a service with a 'non-face to face' and digital model. The emergence of the concept of a 'cashless society' forms a new structure or community that no longer uses paper money or metal but is replaced with the latest technology called electronic money. The emergence of the concept of a cashless society began with the fact that cash for transactions requires many costs, such as issuing physical money, distribution costs, and replacing damaged physical money. The emergence of payments using e-money has become an essential instrument because people's activities using cash are decreasing.²⁷

The existence of the Indonesian Consumer Protection Law is significant as a benchmark in ensuring the provision of legal certainty. That way, it can trigger the growth of a positive impact for electronic wallet users in terms of ensuring and meeting their needs and as a reference for regulating the extent of liability limits that e-wallet entrepreneurs must give. The regulation regarding the standard clause itself is not to discredit the e-wallet or ignore the interests of the e-wallet; on the contrary, the inclusion of this standard clause is expected to foster a sense of equality for users when transacting using an e-wallet. Article 19 of the Indonesian Consumer Protection Law has outlined matters relating to legal certainty for e-wallet users as consumers by providing imperative regulations regarding compensation for non-compliance or damage when the user uses the service. Therefore, the e-wallet must be responsible for all the acts committed by his party and the alleged default from using the services offered in the e-wallet service. Applying the precautionary principle in analyzing several cases of violation of consumer rights begins by looking at which parties are involved and how their responsibilities are so that this can

positively impact the parties and reduce the risk of other adverse problems arising.

According to Soerjono Soekanto, legal protection is all efforts to fulfill rights and provide assistance and a sense of security to witnesses and victims. Legal protection for victims of this crime is a part of protection for the community, which can be realized through various forms, such as providing restitution, compensation, medical services, and legal assistance.²⁸ According to Satjipto Rahardjo, legal protection is the provision to protect human rights that others have harmed. The provision is provided so that the community can enjoy all rights granted by law.²⁹

E-wallet customers must be protected so that their funds are not lost due to provider negligence. The form of legal protection for e-wallet customers carried out by Bank Indonesia begins with making regulations and policies. Protecting customers can be done by making policies toward payment system service providers.³⁰ A refund return is one of the legal protection efforts for e-wallet consumers in Article 21 of *PBI* number 18/40/PBI/2016. When there is a request for a refund, the Electronic Wallet Operator must immediately implement it. Then the Electronic Wallet operator must have a procedure to ensure the implementation of the refund as referred to above. In addition, Article 7 letter f of the Consumer Protection Law also regulates the responsibility that the e-wallet must carry out in providing compensation to consumers if the services obtained are contrary to the agreed agreement. This source of law should be a reference for e-wallets and consumers if consumers experience losses. Providers should pay more attention to the implementation of this law in order to create a symbiotic mutualism for both parties. That is why the e-wallets need to have terms and conditions that benefit both parties. These terms and conditions also have to be based on the duties and rights of each party.

27 Putra, M. F., & Nugroho, L. D. (2020). *Perlindungan Hukum Pengguna Dompot Elektronik Atas Hilangnya Uang Elektronik. PROHUTEK, 1(1).*

28 Soekanto, S. (2009). *Pengantar Penelitian Hukum*, Jakarta: UI Press, p.133.

29 Rahardjo, S. (2000). *Ilmu Hukum*, Bandung: Citra Aditya Bakti, p. 53.

30 Cevalda, D. K., & Kharisma, D. B. (2019). *Op.Cit.*

In addition to the procedures for operating an e-wallet, Bank Indonesia also regulates the protection of e-wallet customers by issuing Bank Indonesia Regulation Number 16/1/PBI/2014 concerning Consumer Protection for Payment System Operators (*PBI Consumer Protection*). The Consumer Protection in *PBI* contains matters that the Operator must comply with. These regulations include that the Operator is prohibited from making or including standard clauses, the Operator is obliged to provide a reliable system in payment system service activities. The Operator is obliged to be responsible to consumers for losses arising from errors on the part of the Operator, the Operator is obliged to provide information regarding the benefits, risks, and consequences for consumers of payment system services, providers are required to provide facilities that make it easier for consumers to obtain information, providers are required to maintain the confidentiality of consumer data and information, providers are required to have and implement a complaint handling mechanism. Providers must carry out outreach and education activities related to consumer protection. After making policies and regulations that need to be obeyed by the organizers and customers, Bank Indonesia also supervises the implementation of these policies as a form of legal protection for customers. Based on the explanation of Law number 3 of 2004 concerning Bank Indonesia (Bank Indonesia Law), Bank Indonesia has the responsibility and authority to realize an efficient, fast, safe, and reliable payment system. One form of implementation of these responsibilities and authorities is by monitoring the payment system so that the payment system runs efficiently, quickly, safely, and reliably. Supervision of the payment system is also intended to support the application of consumer protection principles.³¹

D. CONCLUSION

Every e-wallet consumer is entitled to legal protection following the law on consumer to create a sense of security in

conducting transactions. Consumer electronic wallets that are harmed due to non-compliance with the services received can assess their losses legally through court or out of court under the provisions of the Consumer Protection Law. Upon the errors that harm the consumer, the e-wallet is responsible for giving gifts and providing clear information on the terms & conditions. The terms and conditions clearly explain the responsibilities of both parties, both consumers and application providers, and liability for damages caused by damage to the e-wallet system. Because the rules have not been regulated regarding sanction efforts that violate the standard clauses in the e-wallet, the government should revise the Consumer Protection Law. Bank Indonesia as the authority that regulates the implementation of payment system services, including e-wallets, must ensure the protection of its customers by making regulations and policies and supervising the implementation of these regulations. Supervision is carried out so that the organizers carry out their business under the provisions regulated by Bank Indonesia and obtain appropriate customer service and reduce the occurrence of disputes. Then, legal protection efforts against e-wallet users by Bank Indonesia are carried out based on Bank Indonesia regulations. Bank Indonesia carries out protection efforts by handling consumer complaints and education and literacy.

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31 Cevalda, D. K., & Kharisma, D. B. (2019). *Ibid.*



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