

***LEGAL PROTECTION OF CONSUMERS USING
ELECTRONIC MONEY ON TOLL ROADS (E-TOLL) IS
REVIEWED FROM LAW NUMBER 8 OF 1999
CONCERNING CONSUMER PROTECTION***

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ABSTRACT

UU 8 of 1999 concerning Consumer Protection will play a role in helping the public to obtain justice. However, problems that are also often found are the weak legal protection process for consumers, especially when using toll roads on an electronic payment basis Electronic money (E-Money). One of the functions of using e-money is currently used in toll road services (e-toll), so there is no need to queue which takes a lot of time, the payment process is fast and practical. Apart from these benefits, currently many frauds have emerged which tend to harm consumers and give rise to various legal problems. The increasingly complex problems regarding the use of e-money, therefore an e-money user should be protected legally with regulations. This study was carried out with the aim of observing and explaining legal protection for consumers using electronic money on toll roads and knowing and explaining the responsibilities of electronic money releases for consumers using electronic money. This type of research applies normative juridical legal research, namely efforts to obtain legal regulations in terms of legal principles. The results of the research explain that legal protection for consumers who use electronic money for toll road access is based on Law No. 8 of 1999 regarding efforts to provide consumer protection with preventive legal protection, namely the existence of various regulations from Bank Indonesia as well as through an agreement from the party issuing and holding the card, or by implementing repressive measures, namely the process of resolving disputes by means of court or alternative dispute handling options.

Keywords: *Legal Protection, Consumer Protection, E-Toll*

I. INTRODUCTION

In an increasingly developing era like today, of course it affects human life from various sides. Information technology is one that is developing rapidly. The dynamics of technological change in this era are very influential in all aspects of life in society, especially in the economic, political and socio-cultural fields. The advancement of information technology in the last decade has changed the order of people's lives which leads and relies on the use of technology. Payment is an important component in every trade transaction activity of goods and services. However, the increasingly development of technology today and the increasing value of transactions and risks encourage people to want a safe and smooth payment system and of course also to make it easier for people to make payments.

Developments and advances in the field of electronic payment systems have resulted in the birth of various new innovations in the application of payment systems, provide flexibility, efficiency, and simplicity in the transaction process. Therefore, Bank Indonesia supports the creation of payment instruments that are able to organize these various aspects, or are known as electronic money. As an effort to assist in the economic development on a national scale, especially with in relation to the complexity and complicated advanced financial system, new policies were born in the economic world that are relevant to the financial sector. Through this situation, the Central Bank of Indonesia or BI provides development in the application of monetary policy in managing payment systematics, namely starting from the release of electronic payment methods or systems .¹ Electronic money is considered to have easy access to obtain and use it. The use of electronic money which is also an alternative tool for *non-cash* transactions creates good potential in helping to minimize the scale of growth in the use of cash. Electronic money potential in helping to minimize the scale of growth in the use of cash. Electronic money provides convenience in the transaction process that is efficient and convenient than cash, especially in small-scale transactions because through electronic money, transactions can run easily and provide security and speed of transactions, both for merchants and consumers.²

¹ Muhammad Alfian Williandanu and Arikha Saputra, "Legal Protection Against the Use of Electronic Money on *Toll Roads (E-Toll)* in Review of Law Number 8 of 1999 concerning Consumer Protection", *Journal of Legal Science "THE JURIS"*, ISSN 2580-0299, Vol. VI, No. 2, December 2022, pp. 315.

² Siti Hidayati, et al, *EMoney Operations*, Bank Indonesia, Jakarta, 2006, p.1

The electronic money use policy has been implemented through PBI No: 20/6/PBI/2018 regarding electronic money, through the release of PMPU and PRRI No. 16/PRT/M/2017 regarding Non-Cash Toll Transactions, especially in Chapter 6 paragraph (2) which implicitly states that when the implementation of non-cash toll road money payment transactions, where the entire toll road section does not accept payment transactions in cash. .³

in practice Cashless toll payment transactions are not far from problems and disturbances. Reducing the nominal balance in *e-toll* card twice in one transaction, there are administrative costs to inadequate facilities including in terms of machines and cards that still have the potential to cause consumer losses. Problems that also often occur are the lack of protection in terms of law to consumers on the use of toll roads based on electronic money and the uncertainty of the responsible party for consumer losses. with the enactment of Law No. 8 of 1999 concerning Consumer Protection will be able to provide community assistance to obtain justice.⁴

Law No. 8/1999 on Consumer Protection is instrumental in providing assistance to the public to get justice. The responsibility of business actors for products that do not benefit consumers generally applies legal principles, such as the principle of absolute responsibility. In this concept, consumers can only recognize that there is a causal correlation between the actions of business actors and the losses they experience. Law No. 8/1999 on Consumer Protection efforts emphasizes that the issue of security, comfort, and safety of consumers is considered the main thing in the consumer protection process.⁵

³ Muhammad Alfian Williandanu and Arikha Saputra, *OP. Cit.* p. 315.

⁴ I Gusti Ayu Suarniati, "Legal Protection of E-Money-Based Toll Road Users from the Perspective of Law Number 8 of 1999 concerning Consumer Protection", *Journal of Legal Science*, Faculty of Law, Mahasaraswati University Denpasar, Vol. 8, No. 2, 2018, p. 24

⁵ Muhammad Alfian Williandanu and Arika Saputra, "Legal Protection Against the Use of Electronic Money on Toll Roads (*EToll*) in Review of Law Number 8 of 1999 concerning Consumer Protection", *Journal of Legal Sciences "THE JURIS"*, ISSN 2580-0299, Vol. VI, No. 2, December 2022, p. 316.

The enactment of Law No. 8 of 1999 concerning Consumer Protection is a form of providing legal protection with a consumer focus, but that does not mean that other regulations cannot be formed related to providing legal protection to consumers. Through the implementation of Consumer Protection will help fulfill the rights and justice for consumers, one of which is for electronic money users.⁶

This research is also in line with Muhammad Alfian Williandanu and Arikha Saputra's research on "Legal Protection Against *E-Toll* Electronic Money Utilization Judging from Law No. 8 of 1999 concerning Consumer Protection", the type of research is applied normative juridical. The results of the research reveal that the form of legal protection from the regulation of electronic money transactions and non-cash transactions is to provide protection to users, although not realized, it effectively protects users. The legal substance of BI Regulation No. 20/6 / PBI / 2018 concerning Electronic Money manages the protection of non-cash transactions against electronic money users. Meanwhile, what distinguishes the previous research focuses on legal protection in terms of utilization of *e-toll* cards referring to the review of Law No. 8 of 1999 concerning Consumer Protection. While this research leads to the legal protection of consumers who use *E-Toll* cards seen from Law No. 8 of 1999 concerning Consumer Protection. Furthermore, this research is also in line with Latifah Nur Janah's research on "Consumer Protection of Electronic Money Holders Against Standard Clauses Judging from PBI NO. 20/6/pbi/2018, ds. 20/6/PBI/2018, DSN MUI NO. 116/DSN-MUI/IX/2017, and Law no. 8 of 1999". 8 YEAR 1999". The research method is qualitative, with a comparative juridical approach. The results of the study confirm that regarding the provision of consumer protection for the existence of standardized clauses from Bank Mandiri related to e-money both from the PBI No. 20/6 / PBI / 2018 regarding electronic money, then DSN MUI NO. 116/DSN-MUI/IX/2017 regarding sharia-based electronic money,

⁶ Latifah Nur Janah, "Consumer Protection of Electronic Money Users Against Default Clauses Reviewed from DSN MUI NO. 116/DSN-MUI/IX/2017, PBI NO. 20/6/PBI/2018 and Law NO. 8 Year 1999", Scientific Journal of Islamic Economics, Vol. 8, No. 1, 2022, pp. 265

as well as Law No. 8 of 1999 is considered not running optimally because the standard clause is not directly explained by the regulation. The similarity with this research is that examines consumer protection against the use of electronic money. While the difference is that Latifah Nur Janah's research uses comparative juridical research and is focused on consumer protection of electronic money users on standard clauses seen from DSN MUI NO. 116/DSN-MUI/IX/2017, PBI NO. 20/6/PBI/2018 and Law NO. 8 YEAR 1999. While this research applies normative juridical research and is focused on legal protection for consumers who use E-Toll seen from the provisions of Law No. 8 of 1999 concerning Consumer Protection. And this research is also in line with the research of Agus Dwi Handoko and Adi Suliantoro with the title "Legal Protection of Brizzi Card Users as a Non-Cash Payment Instrument". The method of approach is normative juridical. The results of the research reveal that the risks of card users include top up failure but from debited balances, offline networks, Brizzi damage, loss, passivity, and cost problems. The similarity with Agus Dwi Handoko and Adi Suliantoro's research is they both examine the legal protection of the use of electronic money and apply normative juridical research. While what distinguishes Agus Dwi Handoko and Adi Suliantoro's research is focused on legal protection for Brizzi Card users. While this research is focused on legal protection for customers who use electronic money for E-Toll Judging from Law No. 8 of 1999.

Referring to the description, the author has an interest in carrying out research entitled "Legal Protection for Consumers of Electronic Money Users on Toll Roads (*E-Toll*) in Review of Law No. 8 of 1999 concerning Consumer Protection". This research aims to see and explain the legal protection to consumers of E-Toll users and to know and explain the responsibilities of electronic money releases to users.

1. RESEARCH METHODS

Referring to the background, so the problem is formulated how legal protection for consumers of electronic money users of toll roads and responsibility of electronic money releases. The research method is used normative juridical where Peter Mahmud Marzuki reveals that normative legal research is an effort to obtain legal regulations in terms of legal principles, legal principles and legal doctrines to present solutions and answers to the legal

problems they face.⁷ The theory in this research is based on the 1945 Constitution, Civil Code, Law No. 8 of 1999 concerning consumer protection, BI regulation No. 20/6/PBI/2018 concerning electronic money, PMPU and PRRI No. 16/PRT/M/2017 concerning non-cash transactions on toll roads and several other legal sources.

2. RESEARCH RESULTS AND DISCUSSION

A. Legal Protection for Consumers of Electronic Money Users on Toll Roads According to Law Number 8 of 1999 concerning Consumer Protection

Legal protection is actually divided into two types, namely preventive and repressive legal protection. Legal protection that has a preventive nature is considered as a type of protection that is intended as an anticipation before the emergence of violations. It was explained in Law No. 8 of 1999 concerning Consumer Protection and also anticipation of violations carried out by entrepreneurs and become signs or limits to entrepreneurs to carry out obligations. Meanwhile, repressive legal protection is considered as the final protection of entrepreneurs if problems, disputes or violations arise, with the existence of judicial procedures, either general judicial or other than judicial. Legal protection is carried out if there is a dispute or violation caused by the employer.⁸

The development and advancement of technology opens up many important changes to payment instruments that provide convenience, flexibility, efficiency and security for all types of electronic transactions. The development of payment systems on an electronic basis has resulted in the birth of various innovations in payment processes and systems.⁹

Law No. 8/1999 on Consumer Protection was enacted so that it could become a legal protection for consumers, or the establishment other regulations which also focus on providing protection for consumers. The form of consumer protection was explained in Law No. 8 of 1999, by listing the rights obtained by consumers, as in Chapter 4, among others; (a) The right to security, comfort in the process of using the product; (b) The right to determine the product at the exchange rate, conditions or guarantees that apply; (c) The right to obtain clear information about the product; (d) The right to obtain services; (e) The right to obtain

⁷ Peter Mahmud Marzuki, *Legal Research*, Kencana Prenada, Jakarta, 2010, p. 35.

⁸ Philipus M. Hadjon, *Legal Protection for the People of Indonesia Special Edition*, M2 Print Printing, Surabaya, 2007, pp. 2.

⁹ I Gusti Ayu Suarniati, *Op.Cit* p. 224.

compensation, compensation or compensation if the product received is not the same as the agreement stipulated; (f) The right to have their opinions and complaints about the product heard; (g) The right to obtain guidance and consumer education; and (h) Rights based on other laws and regulations.¹⁰

Consumers in the process of using toll roads can also obtain various potential losses due to the use of electronic fund products, so the issuer is obliged to provide compensation for losses in the use of *e-toll cards*. In order to obtain rights, consumers must comply with what is their obligation, because the rights and obligations of both are related. Consumer obligations are outlined in Chapter 5, namely: (a) Read or obey the information instructions and procedures for product utilization for safety and security; (b) Make good faith to carry out product purchase transactions; (c) Make payments based on the agreed exchange rate and (d) Obey the legal settlement method related to consumer protection disputes. Every entrepreneur has responsibility for all things involved in the business process, this is regulated in the Consumer Protection Law.¹¹

Facilities in legal protection include means in efforts to provide preventive and repressive legal protection. Preventive legal protection presents an opportunity for legal subjects to provide complaints if they object or express their opinions before a definitive decision is made. This legal protection aims to anticipate the potential emergence of problems or disputes. Repressive legal protection is intended as an answer or settlement of a problem or dispute. Legal protection of government actions or policies based on the concept of recognizing and protecting consumer rights. This concept leads to the provision of various restrictions and the placement of obligations on society and the government.¹²

B. The Effectiveness Regulations on Electronic Money and Cashless Toll Transactions in Providing Legal Protection for Users

Legal effectiveness means the capability of the law in realizing conditions like what is expected by the law. A provision is declared effective if it can achieve the objectives as expected in terms of the law and determine the role played by the legal subject and make the

¹⁰ Republic of Indonesia, Law Number 8 Year 1999 on *Consumer Protection*, Chapter 4

¹¹ Latifah Nur Janah, "Consumer Protection of Electronic Money Users Against Default Clauses Reviewed from DSN MUI NO. 116/DSN-MUI/IX/2017, PBI NO. 20/6/PBI/2018 and Law NO. 8 Year 1999", *Scientific Journal of Islamic Economics*, Vol. 8, No. 1, 2022. p. 265. 265.

¹² Philipus M. Hadjon, *Op. Cit.* p. 29.

law more effective if the role of the legal subjects has achieved what is the provision of the law.¹³

Explaining the effectiveness of regulations regarding electronic money on e-toll non-cash transactions in this concept outlines the effectiveness of providing legal protection to parties using electronic money services, Lawrence M. Friedman asserts that success in enforcing the rule of law will refer to the substance of law as a substantial system that has an impact on whether or not the law is applied. Substance is the product of the results of individuals in the legal system, which can take the form of new decisions or regulations. The substance includes elements of *living law*, not just in the form of rules in *law books*. As a country with a *civil law system*, the law is stated as a written form of regulation while unwritten rules are not stated as law.¹⁴

Legal substance includes laws with binding force and as guidelines for law enforcement parties. BI Regulation No. 20/6/PBI/2018 regarding Electronic Money and PMPU and PRRI No. 16/PRT/M/2017 regarding the payment of Non-Cash Toll Transactions on Toll Roads which are legal products of substance have ensured the provision of protection to consumers. This is due to both of regulations contain Chapters related to methods of providing protection to users. However, the provision of protection is considered not to be maximized because BI Regulation No. 20/6/PBI/2018 on Electronic Money does not explain more about the standard clause.¹⁵

BI Regulation No. 20/6/PBI/2018 on Electronic Money does not elaborate on standard clause because the standard clause is contained in the contents of agreement between the issuer and the user, namely when the individual has just purchased an *e-toll* card, the user is given the terms of using card. These terms and conditions are considered a form of agreement that applies. Knowledge related to standard clauses in standard agreements between issuers and users of electronic money must contain the same content so that they can understand the clauses in the agreement.

¹³ Haikal Ramadhan, "Legal Protection of Electronic Money Users in Conducting Transactions in Review of Bank Indonesia Regulation Number 16/8/Pbi/2014 concerning Electronic Money (*E-Money*)", *Diponegoro Law Review*, Vol. 5, No. 2, 2016, p. 1. 1.

¹⁴ Fajar Nurhardianto, "Indonesia's Legal System and Legal Position". *TAPIS Journal*, Vol. 11 No. 1, January-June, 2015, p. 37.

¹⁵ Haikal Ramadhan, *Op.Cit*, p. 20

The structural system is also considered a factor that determines the success or failure of the law to be enforced. The law cannot be implemented properly if the law enforcers are not qualified. Even though the legal product is good, if the performance of the apparatus is not optimal in carrying out its duties, this will prevent the realization of justice to the fullest. So, the successful application of the law results from the performance of law enforcement officers or that law enforcement factors play an important role in driving the realization of the law. Substance and legal structure have a strong and close correlation, if this regulation has been running well, but law enforcers still have low competence and quality this will also be a problem. Otherwise, if the regulation is bad but the quality of the legal apparatus is competent and good, this can still be controlled properly.¹⁶

Based on the descriptions above, the author can analyze that BI in Chapter 67 of PBI No 20/6/PBI/2018 regarding Electronic Money and BPJT in Chapter 12 of PMPU and PRRI No 16/PRT/M/2017 regarding Non-Cash Toll Transactions on Toll Roads. Both institutions are authorized to oversee the implication process of using electronic money and non-cash toll transactions. However, the Chapter on law enforcement has not been explained in both regulations, but if a dispute occurs, a civil lawsuit can be filed with the court or dispute handling other than court matters based on Chapter 38 and Chapter 39 paragraph (2) of Law No. 11 of 2008 and Electronic Transactions in conjunction with Law No. 19 of 2016 concerning Transition to Law No. 11 of 2008.

C. The Responsibility of Electronic Money Issuers Towards Electronic Money Holder Consumers According to Law Number 8 of 1999 concerning Consumer Protection

The legal relationship in the transaction process using electronic money runs between the system organizer and the card user. The organizer of the transaction system with electronic money is the principal, issuing bank and *acquirer*. In terms of electronic product transactions, the selling partner or *merchant* is not considered as the implementing party of the electronic system. However, in general, many people consider it as an electronic system organizer. Then the seller or merchant and the card user are considered as consumers of the electronic payment system *developer* or implemented by the *provider*.¹⁷

¹⁶ Achmad Ali, *Revealing the Veil of Law*. Gunung Agung, Jakarta, 2002, pp. 8.

¹⁷ Edmon Makarim, *Compilation of Telematics Law* Raja Grafindo Persada, Jakarta, 2004, p.

342. 342.

The implication is that the position of merchants and e-money card users is not equal or equal. Card owners who are also consumers are very vulnerable because the information transferred in electronic transactions requires the involvement of personal card user data. So the protection of electronic money card users who are consumers apart from the electronic system also gets guarantees in terms of law.

There are a number of principles of responsibility related to the activities of entrepreneurs who are the organizers of electronic transactions, namely responsibility based on the element of fault; this principle emphasizes that individuals or entrepreneurs can only be held liable from a legal perspective if there is an element of fault found. This principle is also implemented in the contents of the Civil Code, namely in Chapters 1365, 1366, 1367 of the Civil Code.¹⁸

Actions that claim responsibility referred to Chapter 1365 of the Civil Code must comply with the main elements, namely the discovery of actions that violate legal rules; the discovery of fault; losses; and the causal relationship of fault and losses. Individuals must not only bear the losses caused by their actions but also the losses caused by the goods under their supervision. This is referred to in legal doctrine as *vicorius liability* or liability that exists because of the fault of the person in monitoring and *corporate liability* which focuses on the responsibility of entities or companies for the workers they employ.

Based on the descriptions above, the researcher analyzes that the responsibility of the party issuing electronic money to consumers who use electronic money according to Law No. 8 of 1999 concerning Consumer Protection is as a consequence of the rights of electronic money issuers, publishers have obligations as described in Chapter 7 of the Consumer Protection Law related to a number of obligations from the release of electronic money, including: (a) Run their business in good faith; (b) Provide access to clear and precise, clear and honest information related to the condition and guarantee of electronic money cards and related to use, repair and maintenance; (c) Provide services to consumers honestly and equally; (d) Ensure the quality of electronic money cards; (e) Open opportunities for consumers to test electronic money cards; (f) Provide compensation, compensation and / or

¹⁸ Inosentius Samsul, *Consumer Protection: Possible Application of Absolute Liability*, University of Indonesia, Jakarta, 2004, pp. 71.

compensation for losses in consumption or use of electronic money cards; (g) Provide compensation, compensation and / or compensation if the electronic money card is different from the agreement.

D. The Obligations of Business Actors Toward Consumers of Electronic Money Holders According to Law Number 8 of 1999 concerning Consumer Protection

Law No. 8/1999 on Consumer Protection describes the rights and obligations of entrepreneurs. Entrepreneurs have a number of rights that must be respected by consumers, government, or society. The rights of entrepreneurs according to Law No. 8 of 1999 include: the right to receive payment of money based on the agreement of the circumstances and the exchange value of the product, the right to obtain legal protection due to the actions of consumers in bad faith, the right to defend themselves in the process of legal settlement or the occurrence of disputes with consumers, the right to carry out good name rehabilitation if it is proven from a legal point of view that the consumer's loss does not originate from the product being traded, the rights referred to in the provisions of other laws and regulations.

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In order to guarantee consumer rights, entrepreneurs who are also implementing electronic payment systems have obligations as attached in Chapter 7 of Law No. 8 of 1999 concerning Consumer Protection, namely: ²⁰

- a. has good intentions in operating its business.
- b. Providing access to clear, correct and honest information regarding condition and guarantee of product as well as explanations regarding use, repair and maintenance of product.
- c. Providing services to consumers honestly and equally.
- d. Ensure product quality meets applicable product quality standards.
- e. Open opportunities for consumers to test or trial products and provide product warranties.
- f. Provide compensation, damages or compensation if there is any loss resulting from the use, utilization or consumption of the product.

¹⁹ Sudaryatmo, *Legal Issues in Consumer Protection in Indonesia*, Citra Aditya Bakti, Bandung, 2006, pp. 36.

²⁰ *Ibid.* p. 137.

g. Provide compensation, compensation and/or replacement if the product is not the same as what was promised. In carrying out its activities.

Referred to Chapter 3 of PBI "Electronic Money, Principals have a number of obligations: (a) Implement objective and open procedures and conditions; (b) Carry out supervision of securities and system and network reliability. Objective procedures and conditions must be based on the requirements of the principal and implement equal treatment for all issuers and acquirers. Meanwhile, the element of transparency refers to the openness of adequate access to information for issuers and acquirers on efforts to develop, implement procedures and requirements from the principal. Supervision carried out by the principal on the securities and network reliability of the issuer and acquirer is carried out effectively either by monitoring with an on-line system or checking at the location of the issuer and acquirer.²¹

In the implications of using electronic money, it is necessary to consider the interests of stakeholders, whether individuals, groups, communities, or communities, whether comprehensive or partial in nature with a correlation of related interests. It is intended that the process of implementing the use of electronic money can run on the basis of the concept of usefulness by fostering cooperation in building the sustainability of the implementation of electronic money activities.²²

Electronic money card users must obtain justice and equal rights in presenting a good correlation between card users, issuers related to the agreement to use electronic money payment instruments. BI regulations focus more on the authority to manage the electronic money activities of the implementing party rather than the protection of card users, this is because the cash value of electronic money is not guaranteed by LPS.

3. CONCLUSIONS

Based on the results of the research, it is concluded that legal protection for consumers who use electronic money on toll roads according to Law No. 8 of 1999 concerning Consumer Protection is legal protection for card users in terms of payment transactions with electronic money by providing preventive legal protection, namely through BI regulations and through

²¹ Janus Sidabalok, *Consumer Protection Law in Indonesia*, Citra Aditya Bakti, Bandung, 2010, pp. 37.

²² Adrian Sutedi, *Product Liability in Consumer Protection Law*, Ghalia Indonesia. Jakarta,

2006, p, 96.

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