

Legal Protection of Children's Personal Data in The Digital Age in Indonesia: A Comparative of Government Regulation Number 17 of 2025 and *General Data Protection Regulation* Uni Eropa

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Abstract

Advances in digital technology increase the risk of misuse of children's personal data, thereby placing children as a vulnerable group in the digital space. This study aims to analyze the legal protection of children's personal data under Government Regulation No. 17 of 2025 and compare it with the European Union's General Data Protection Regulation. The focus of the study lies on the ability of Government Regulation No. 17 of 2025 to provide protection for children's personal data. This study employs a normative legal methods using a legislative and comparative law approach. The findings indicate that Government Regulation No. 17 of 2025 has established protections through age limits, parental consent, age



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verification, supervision, and administrative sanctions. However, these provisions remain focused on administrative compliance and are not yet supported by adequate mechanisms for the restoration of children's rights, including compensation and data deletion, as well as the absence of an independent supervisory authority. This study recommends strengthening aspects of implementation, institutional framework, and recognition of substantive rights so that the protection of children's personal data can function optimally.

KEYWORDS

Protection of Children's Personal Data, Government Regulation No. 17 of 2025, General Data Protection Regulation

Introduction

The rapid advancement of information and communication technology in today's digital age has profoundly impacted various aspects of people's lives. The use of information technology in daily activities makes it easier to interact, conduct transactions, and access information.¹ Today, information technology enables the collection, storage, sharing, and analysis of data.² This has made digital technology an integral part of human life. Current technological advancements affect not only adults but also children, who are also using digital technology.

Data from United Nations Children's Fund (UNICEF) indicates that 9.17% of internet users in Indonesia are under the age of 12. The Central Statistics Agency also states that 39.71% of young children in Indonesia have

¹ Muhammad Irwan Padli Khoirunnisya Gita, "Development of Information Technology in Indonesia," *Jurnal Sains Student Research* 3, no. 1 (2025): 21–33, <https://doi.org/https://doi.org/10.61722/jssr.v3i1.3128>.

² Perwita Andy Safitri, "Information and Communication Technology as a Means of Improving Services During the Pandemic", Directorate General of State Assets, 2021, <https://www.djkn.kemenkeu.go.id/kpknl-yogyakarta/baca-artikel/14031/Teknologi-Informasi-dan-Komunikasi-Sebagai-Sarana-Peningkatan-Layanan-di-Masa-Pandemi.html>. (accessed 24 January 2026).

used mobile phones, and 35.57% have accessed the internet.³ Children who have become active users of digital technology have indirectly used their personal data for various purposes, such as online learning, communication via social media, and entertainment activities like online gaming.

The use of this technology generally offers positive benefits for children, particularly in expanding access to information, supporting the learning process, and facilitating communication in the digital space. However, children often use the internet without direct parental supervision, meaning parents are not fully aware of the types of information their children access and receive while online. Additionally, most children do not yet have a sufficient understanding of how to use digital technology appropriately and wisely. This situation has the potential to increase the risk of technology misuse, which can be detrimental to children's development.⁴

These conditions place children in a vulnerable position regarding various forms of crime in the digital space. Children are at risk of becoming victims of cybercrime and being exposed to inappropriate content such as pornography, violence, misinformation, or other harmful content. Additionally, there is concern that children may interact with strangers who could send them inappropriate messages. This vulnerability indicates that children do not yet possess the adequate capacity to protect themselves independently in the digital space.

Uncontrolled use of technology can lead to addictions, such as online gaming addiction where children play until late at night, resulting in insufficient sleep and a decline in academic performance. It is also not uncommon for children to be exposed to online gambling ads disguised as online games. This vulnerability becomes even more complex when children

³ Muhammad Adimaja, "Government Commitment to Protecting Children in the Digital Space" Komdigi.go.id, 2025, <https://www.komdigi.go.id/berita/artikel/detail/komitmen-pemerintah-melindungi-anak-di-ruang-digital>. (accessed 12 February 2026).

⁴ Dian Narwastuty Anargya Shafira, "Protection of Personal Data of Cyberbullying Minors Linked to Doxing by Social Media Users Under the PDP Law" *Journal of Swara Justisia* 9, no. 1 (2025): 37–44, <https://doi.org/https://doi.org/10.31933/z05jw770>.

unknowingly share their personal data on online forums or with third parties without understanding how that data will be used, potentially leading to the theft and misuse of personal data. This situation demonstrates that children are in a highly vulnerable position regarding various risks in the digital space.⁵

The stolen and misused data could potentially be used for various criminal activities, such as doxing, extortion, threats, creating fake social media accounts, visual manipulation through deepfakes, and online fraud.⁶ This situation not only creates an administrative burden and financial losses, but also has the potential to cause psychological and social impacts on children, as the digital footprints formed during childhood may persist into adulthood.⁷ These impacts can affect children's sense of security, self-confidence, and social development in the long term. The misuse of personal data can also open the door to further exploitation if not addressed promptly. Therefore, the protection of children's personal data is a crucial aspect of the digital ecosystem.

One of the cases of personal data breaches in Indonesia involving minors occurred in 2021, specifically the leak of the complaint database belonging to the Indonesian Child Protection Commission. The files contained complaint reports that included sensitive data belonging to the victims (children) and complainants, such as names, gender, age, address, phone number, National Identity Number, case summaries, mediation results, and the stages of the reporting process from 2016 to 2021. This data breach has the potential to lead to various risks, such as misuse of personal data, fraud, and identity theft, which could have serious implications for the

⁵ Regina and Ridham Priskap Caeli, Sukamto Satoto, "Regulation of Child Identity Cards in the National Database System According to Indonesia Law," *Hangoluan Law Review* 3, no. 2 (2024): 399–428, <https://hlr.unja.ac.id/index.php/hlr/article/view/54>.

⁶ Wiwik Meilarati Maskun, *Legal Aspects of Internet Based Fraud* (Bandung: Buku-Buku Ilmu Hukum, 2017).

⁷ Administrator, "Red Flag Child Abuse: Online Crimes to Watch Out For, 2025, <https://ifii.ppatk.go.id/id/Web/Berita/detil/320/>.

safety and protection of children.⁸ This incident highlights the weakness of personal data security systems, particularly those related to vulnerable groups such as children.

The misuse of children's personal data poses a serious problem because children do not yet have the capacity to fully understand the risks and consequences of their digital activities. Children require special protection, including in the management of their personal data. The importance of protecting children has been emphasized in Law No. 35 of 2014 amending Law No. 23 of 2002 on Child Protection, which states that children are a trust and a gift from God Almighty, whose rights must be protected so that they can grow and develop optimally.⁹ This principle of child protection should also be applied in the context of the use of information technology and the management of children's personal data.

The Indonesian government has responded to the growing risk of personal data breaches by establishing a legal framework through the Personal Data Protection Act, which sets forth fundamental principles for the processing of personal data.¹⁰ These measures are intended to strengthen the capacity to detect and mitigate potential personal data breaches.¹¹ These provisions were subsequently clarified through Government Regulation No. 17 of 2025 on the Governance of Electronic Systems in Child Protection, which officially took effect on March 28,

⁸ Yuslianson, "KPAI Complaints Database Leaked and Bought and Sold on RaidForums," *Liputan6.com*, 2021, <https://www.liputan6.com/tekno/read/4689830/database-pengaduan-kpai-bocor-dan-diperjualbelikan-di-raidforums>. (accessed 25 January 2026).

⁹ Indonesian Government, "Law Number 35 of 2014 concerning Amendments to Law Number 23 of 2002 concerning Child Protection" (n.d.), <https://peraturan.bpk.go.id/Details/38723/uu-no-35-tahun-2014>.

¹⁰ Faiz Al-haq Naufal Rizqiyanto, Azmi Fathu, "Legal Policy for the Formation of Law Number 27 of 2022 concerning Personal Data Protection" *Indonesian Legal Media* 2, no. 2 (2024): 1–14, <https://doi.org/https://doi.org/10.5281/zenodo.10794419>.

¹¹ Muchammad Shidqon Prabowo Dewi Sulistianingsih, Miftakhul Ihwan, Andry Setiawan, "Personal Data Protection Governance in the Metaverse Era (A Legal Review of the Personal Data Protection Law)," *Journal of Legal Issues* 52, no. 1 (2023): 97–106, <https://doi.org/https://doi.org/10.14710/mmh.52.1.2023.97-106>.

2026.¹² Government Regulation No. 17 of 2025 specifically regulates child protection in the operation of electronic systems involving the processing of personal data. Government Regulation No. 17 of 2025 is an implementing regulation to carry out the mandate of Article 16A Paragraph (5) regarding protection for children who use or access electronic systems and Article 16B Paragraph (3) of the ITE Law regarding the imposition of administrative sanctions.¹³

Several previous studies have examined the protection of children's personal data from various perspectives. *First*, the study by Jeanlly Andarson Partogi Simanjuntak, Arthur Fang, and Jusuf Ardi Putra (2026), titled "A Comparative Analysis of Children's Personal Data Protection Regulations Based on No. 27 of 2022 and the Personal Data Protection Act 2012" focuses more on comparing the regulations on children's personal data protection between Indonesian and Singaporean laws within the framework of personal data protection legislation.¹⁴

Second, the study by Duta Agung Rohmansyah, Kevin Mandela Saputra, and Badrus Sholih (2023), titled "The Urgency of Protecting Children's Human Rights Regarding Personal Data in the Digital Age Based on the Rule of Law," emphasizes a conceptual analysis of the importance of protecting children's personal data as part of fulfilling human rights from the perspective of the rule of law.¹⁵ *Third*, the study by Nabila Ishma Nurhabibah, Sinta Dewi Rosadi, and Fatmi Utarie Nasution (2023), titled

¹² Ministry of Communications and Digital, *A Glance at the TUNAS Government Regulation on Child Protection in the Digital Space* (Jakarta: Ministry of Communications and Digital, 2025), <https://djkm.komdigi.go.id/assets/files/tunaspedia-buku-1.pdf>.

¹³ Pemerintah Indonesia, "Second Amendment to Law Number 11 of 2008 concerning Electronic Information and Transactions" (n.d.), <https://peraturan.bpk.go.id/details/274494/uu-no-1-tahun-2024>.

¹⁴ Jusuf Ardi Jeanlly Andarson, Arthur Fang, "Comparative Analysis of Children's Personal Data Protection Regulations Based on Law No. 27 of 2022 concerning Personal Data Protection and the Personal Data Protection Act," *Journal of Multidisciplinary Science* 4, no. 5 (2025): 3506–17, <https://doi.org/https://doi.org/10.38035/jim.v4i5>.

¹⁵ Duta Agung Rohmansyah, Kevin Mandela Saputra, and Badrus Sholih, "The Urgency of Protecting Children's Human Rights Over Personal Data in the Era of Digitalization Based on the Principles of the Rule of Law" *Journal of Islamic Law and Social Institutions* 5, no. 2 (2023): 1099–1110, <https://doi.org/10.37680/almanhaj.v5i2.3054>.

“The Responsibilities of Data Controllers in Providing Protection for Children’s Personal Data in Indonesia (A Comparative Study with the United Kingdom),” focuses more on comparing personal data protection regulations between Indonesian and UK laws.¹⁶ Based on various previous studies, this research offers a novel contribution in the form of a comparative analysis between the Government Regulation No. 17 of 2025 and the EU’s General Data Protection Regulation. This study highlights aspects that remain inadequately addressed in the Government Regulation No. 17 of 2025.

The issue with Government Regulation No. 17 of 2025 lies in the fact that it does not yet provide for mechanisms for the restoration of rights and the erasure of data (the right to be forgotten) for children who are victims in the event of a violation. The absence of an independent supervisory body specifically empowered to handle and address violations is also a problem in Government Regulation No. 17 of 2025. These conditions have the potential to hinder the effectiveness of children’s personal data protection in practice. There is concern that incomplete regulations could lead to legal uncertainty for victims in obtaining redress, making it necessary to strengthen regulations to be more responsive to the need for child protection in the digital space.

Based on this background, this study formulates two main research questions: how is the legal protection of children’s personal data addressed in the digital age under Government Regulation No. 17 of 2025, and how does the legal protection of children’s personal data under Government Regulation No. 17 of 2025 compare to the European Union’s General Data Protection Regulation. This study aims to examine and analyze the form of legal protection for children’s personal data under Government Regulation No. 17 of 2025 and compare it with the provisions of the General Data

¹⁶ Fatmi Utarie Nasution Nabila Ishma Nurhabibaha, Sinta Dewi Rosadia, “Data Controller Responsibilities in Protecting Children’s Personal Data in Indonesia: A Comparative Study with the United Kingdom” *Morality Journal of Legal Studies* 9, no. 2 (2023): 207–23, <https://doi.org/http://dx.doi.org/10.52947/morality.v9i2.366>.

Protection Regulation. This study is expected to provide recommendations for strengthening norms and institutional frameworks that are more structured, accountable, and effective to achieve optimal legal protection for children in the operation of electronic systems.

Methods

This study employs a normative legal research method using a legislative and comparative law approach. Research data was obtained through a literature review, consisting of primary legal materials in the form of laws and regulations in force in Indonesia. The secondary legal materials used include books, scientific journal articles, previous research relevant to the protection of children's personal data, and official online sources.¹⁷

This data was analyzed qualitatively using a normative legal approach and comparative law methods to interpret applicable provisions, compare regulatory frameworks, and identify legal loopholes so that the results of the analysis can serve as a foundation for improving and strengthening regulations related to the protection of children's personal data in Indonesia.

¹⁷ Dr. Wiwik Sri Widiarty, S.H., M.H. *Textbook of Legal Research Methods*, ed. Muhammad Tajuddin, 1st ed. (Yogyakarta: Publika Global Media, 2024), <https://share.google/fqVWKowfgfHLaXFqB>.

Result and Discussion

1. Legal Protection of Children's Personal Data in the Digital Age Under Government Regulation Number 17 of 2025

The protection of children's personal data in Indonesia is essentially not a new concept, as the guarantee of personal data protection has been enshrined in the Constitution of the Republic of Indonesia. Article 28G Paragraph (1) of the 1945 Constitution of the Republic of Indonesia states that every person has the right to protection of their person, family, honor, dignity, and property under their control, as well as the right to a sense of security and protection from threats or fear of being compelled to do or refrain from doing something that constitutes a fundamental right.¹⁸ The phrase "every person" in that provision applies generally to all living legal subjects; thus, children may be considered part of the citizenry and are included within the scope of that constitutional protection. Legally speaking, the assertion that children fall within the category of "every person" is linked to the definition of a child under the Indonesian legal system.

Generally, a child is understood to be an individual who has not yet reached adulthood, that is, who is under 18 years of age and unmarried. This age limit is stipulated in various laws and regulations, including Article 1 Paragraph (1) of Law No. 35 of 2014 on Child Protection¹⁹ and Article 1 Paragraph (5) of Law No. 39 of 1999 on Human Rights.²⁰ Similar provisions are also set forth in Article 47 Paragraph (1) of Law No. 1 of 1974 on

¹⁸ Indonesian Government, "The 1945 Constitution of the Republic of Indonesia" (n.d.), <https://peraturan.bpk.go.id/Details/101646/uud-no>.

¹⁹ Indonesian Government, Law Number 35 of 2014 concerning Amendments to Law Number 23 of 2002 concerning Child Protection.

²⁰ Indonesian Government, "Law Number 39 of 1999 concerning Human Rights" (1999), <https://peraturan.bpk.go.id/Details/45361/uu-no-39-tahun-1999>.

Marriage, as amended by Law No. 16 of 2019²¹ as well as Law No. 11 of 2012 on the Juvenile Criminal Justice System.²² The new Criminal Code, namely Law No. 1 of 2023, also establishes, in principle, that a child is defined as a person under the age of 18.²³ Differences in age limits are also found in several other provisions, namely being under 21 years of age and never having been married, as stipulated in Article 1, Paragraph (2) of Law No. 4 of 1979 on Child Welfare²⁴ and Article 330 of the Civil Code.²⁵

Child protection is an integral part of the protection of human rights. This includes ensuring children's rights to privacy and a sense of security. Efforts to protect children must begin early and be based on the principles set forth in the Child Protection Act. First, the principle of nondiscrimination, which prohibits any distinction, restriction, or exclusion of children, whether directly or indirectly, based on religion, ethnicity, race, social status, economic status, culture, or gender.

Second, the principle of the best interests of the child affirms that every action concerning a child must be the primary consideration. This provision applies to the government, society, as well as the legislative and judicial branches. Third, the principle of the right to life, survival, and development emphasizes that every child has the right to live in safety, tranquility, peace, happiness, and physical and mental well-being. The fulfillment of these rights encompasses the basic needs for optimal growth and development, including the attainment of a standard of living appropriate for the child's physical, mental, spiritual, moral, and social development. *Fourth*, the principle of respect for the child's views or opinions grants the child the right to express their views on all matters affecting them, including the right to

²¹ Indonesian Government, "Law Number 1 of 1974 concerning Marriage" (n.d.), <https://peraturan.bpk.go.id/Details/47406/uu-no-1-tahun-1974>.

²² Indonesian Government, "Law Number 11 of 2012 concerning the Juvenile Criminal Justice System" (n.d.), <https://peraturan.bpk.go.id/Details/39061/uu-no-11-tahun-2012>.

²³ Indonesian Government, "Law Number 1 of 2023 concerning the Criminal Code" (n.d.), <https://peraturan.bpk.go.id/Details/234935/uu-no-1-tahun-2023>.

²⁴ Indonesian Government, "Law Number 4 of 1979 concerning Child Welfare" (n.d.), <https://peraturan.bpk.go.id/Details/47148/uu-no-4-tahun-1979>.

²⁵ Indonesian Government, *Civil Code*, n.d.

access appropriate information and to be protected from harmful information.²⁶

The privacy theory proposed by Alan F. Westin asserts that every individual has the right to determine when, how, and to what extent information about themselves is communicated to others.²⁷ This theory regards control over information as a right inherent to the individual. This right indicates that every individual has control over their personal information. However, in the context of children, this right cannot yet be fully exercised due to legal limitations on their ability to control the use of their personal data.

The connection between privacy theory and regulation is reflected in the state's role in providing protection to children who are not yet able to protect themselves. The state, together with electronic system operators, is obligated to establish protection mechanisms. These mechanisms must ensure that children's personal data is not processed, disseminated, or utilized without a legal basis and adequate security safeguards. Therefore, the protection of children's personal data cannot be viewed merely as an administrative matter but is a tangible manifestation of the fulfillment of the right to privacy, which is inseparable from the principle of the best interests of the child.

Article 28I Paragraph (4) of the 1945 Constitution of the Republic of Indonesia stipulates that the state is obligated to guarantee and protect the rights of every citizen through adequate legal instruments. This obligation includes the protection of personal data and information.²⁸ The Indonesian government has enacted various laws and regulations that specifically address children. These regulations include, among others, Law No. 4 of 1979 on Child Welfare and Law No. 35 of 2014 on Child Protection. More

²⁶ Rika Saraswati, *Child Protection Law in Indonesia* (Bandung: PT Citra Aditya Bakti, 2015).

²⁷ Luisa Rollenhagen, "Alan Westin Is the Father of Modern Data Privacy Law," Osano.com, <https://www.osano.com/articles/alan-westin>. (accessed 3 March 2026).

²⁸ Indonesian Government, "The 1945 Constitution of the Republic of Indonesia" (n.d.), <https://peraturan.bpk.go.id/Details/101646/uud-no>.

specific protection in the digital space is also provided through Government Regulation No. 17 of 2025 on the Governance of Electronic Systems in Child Protection.

Government Regulation No. 17 of 2025 on the Governance of Electronic Systems in Child Protection, or the Governance Regulation for Safe and Healthy Children, is an implementing regulation of the Personal Data Protection Act specifically designed to regulate child protection in the digital space, including on social media platforms and online games. This regulation is specifically designed to govern child protection in the digital space, including on social media platforms and online games.

The primary objective of Government Regulation No. 17 of 2025 is to strengthen the protection system while safeguarding children and adolescents from various risks in the digital space. These risks include exposure to inappropriate content, misuse and exploitation of personal data, cyberbullying, and online scams targeting children's naivety. Additionally, the rising number of cases of children's addiction to digital technology has also been a primary concern in the design of this policy.²⁹

Government Regulation No. 17 of 2025 explicitly requires electronic system operators to provide comprehensive protection for children regarding their use of and access to electronic systems. This obligation is not merely administrative but also substantive, namely ensuring that every digital service and feature provided takes into account safety aspects and the best interests of children. As stipulated in Article 2 Paragraph (4), electronic system operators are required to provide clear and easily understandable information regarding the minimum age limit for users permitted to access digital platforms.³⁰ Electronic system operators must

²⁹ Administrator, "PP TUNAS: Government Steps to Protect Children and Vulnerable Groups in the Digital Space," Komdigi.go.id, 2025, <https://www.komdigi.go.id/berita/siaran-pers/detail/pp-tunas-langkah-pemerintah-lindungi-anak-dan-kelompok-rentan-di-ruang-digital>. (accessed 4 March 2026).

³⁰ Indonesian Government, "Government Regulation (PP) Number 17 of 2025 concerning the Governance of Electronic Systems for Child Protection" Paragraph 2 Pub. L. No. State Gazette 2025 No. 36, TSupplement to State Gazette No. 7105: 34 pages (n.d.), <https://peraturan.bpk.go.id/Details/316698/pp-no-17-tahun-2025>.

also implement effective user age verification mechanisms to prevent identity fraud that could potentially grant children access to content inappropriate for their developmental stage.

Operators of electronic systems are required to provide responsive and accountable reporting mechanisms. This obligation applies when there is content, features, or activities on a digital platform that may violate children's rights. These mechanisms serve as a vital tool for ensuring public participation while strengthening oversight of electronic system operations. This regulation is expected to support the protection of children in the digital space through both preventive and enforcement measures.³¹

Efforts to protect children in the digital space are also implemented through policies restricting access to digital content and platforms. These policies are formulated based on the risk classification of platforms and the age of users. The provisions regarding this, as stipulated in Article 5, classify the risk levels of digital platforms into two categories: low risk and high risk. Low risk refers to digital platforms that pose a relatively small potential for negative impact on children's safety and development. Platforms in this category generally have limited interaction features, more controlled content, and do not provide extensive opportunities for users to communicate freely with other users. With these characteristics, low risk platforms tend to be less vulnerable to various threats in the digital space.

High risk platforms refer to digital platforms that pose a greater potential threat to children. These are typically characterized by features that allow open interaction among users. Such features include comment sections, private messaging, live streaming, and the ability for users to freely upload and share content. The presence of these features increases the likelihood of children being exposed to various risks in the digital space, such as cyberbullying, child exploitation, exposure to age inappropriate

³¹ Administrator, "Implementation of Child Protection for Accessing Electronic Systems Based on Government Regulation Number 17 of 2025," SIP Law Firm, 2025, <https://siplawfirm.id/implementasi-pelindungan-anak-yang-mengakses-sistem-elektronik-berdasarkan-peraturan-pemerintah-nomor-17-tahun-2025/?lang=id>.

content, and misuse of personal data. This situation calls for stricter oversight and the implementation of more comprehensive protection mechanisms for child users.³²

Regulations regarding children's use of digital platforms also require consent from a parent or guardian. This provision applies to children under the age of 17 before they can access or use services on digital platforms. Such consent is obtained through a notification mechanism sent to the parent or guardian to secure confirmation. These regulations aim to ensure that children's activities on digital platforms remain under the supervision and with the consent of those responsible for the child.³³

The implementation of a parental consent mechanism not only serves as a form of protection for children but also plays an educational role in raising awareness and promoting digital literacy within the family environment. Through this involvement, parents or guardians gain insight into their children's digital activities, identify potential risks in the digital space, and provide appropriate guidance on the wise and responsible use of technology.³⁴ Parental or guardian involvement is not limited to providing formal consent. This role extends to active involvement in monitoring, supporting, and guiding children as they interact with digital platforms, which plays a significant role in reducing various risks in cyberspace.

The success of this role depends heavily on the capabilities of parents, guardians, and educators. Low digital literacy among this group has the potential to become a serious obstacle to creating a safe digital environment for children. Child protection cannot rely solely on regulations and

³² Indonesian Government, "Government Regulation (PP) Number 17 of 2025 concerning the Governance of Electronic Systems for Child Protection" Paragraph 5 Pub. L. No. State Gazette 2025 No. 36, TSupplement to State Gazette No. 7105: 34 pages (n.d.), <https://peraturan.bpk.go.id/Details/316698/pp-no-17-tahun-2025>.

³³ Administrator, "Protecting Children in the Digital Era, KEMKOMDIGI Requires AAge Verification on Digital Platforms" Komdigi.go.id, 2025, <https://www.komdigi.go.id/berita/siaran-pers/detail/lindungi-anak-di-era-digital-kemkomdigi-wajibkan-verifikasi-usia-di-platform-digital>.

³⁴ Esya Anesty Mashudi Mutiara Prahasti, Nenden Sundari, "The Role of Parents in Developing Digital Literacy in Early Childhood: A Study of Kindergartens in East Jakarta" *Journal of Early Childhood Education* 9, no. 5 (2025): 1801–16, <https://doi.org/10.31004/obsesi.v9i5.7285>.

technology. The readiness of parents, guardians, and educators is a critical factor in ensuring the effectiveness of such protection. Improving digital literacy among this group is necessary so that they can effectively understand, utilize, and monitor children's digital activities.

Regulations regarding children's use of digital platforms do not only emphasize parental consent but also take into account the minimum age limits for children as stipulated in Article 20. Under these provisions, children's ages are categorized into several age groups. These age ranges include 3 to 5 years, 6 to 9 years, 10 to 12 years, 13 to 15 years, and 16 to 18 years. This grouping of age ranges is based on considerations regarding children's needs tailored to their developmental stages, so that the forms of access and protection provided to children can be adapted to their level of maturity.³⁵

Regulations regarding age restrictions are important given that children are a vulnerable group still in the process of cognitive, emotional, and social development. This vulnerability stems from children's not yet fully developed ability to navigate the dynamics of the digital space. Each age group possesses different capabilities in understanding information, interacting with other users, and assessing potential risks. Age based access restrictions serve as a preventive measure to protect children from exposure to age-inappropriate content and various forms of online crime.

The implementation of these provisions requires the support of age verification mechanisms by electronic system operators. These mechanisms aim to ensure that children cannot easily access digital services that are not appropriate for their age group. Age verification enables digital platforms to restrict access to certain features. These mechanisms are also supported by content filtering and the provision of additional protection systems for child users tailored to their age group.³⁶

³⁵ Indonesian Government, "Government Regulation (PP) Number 17 of 2025 concerning the Governance of Electronic Systems for Child Protection" Paragraph 20 Pub. L. No. State Gazette 2025 No. 36, Supplement to State Gazette No. 7105: 34 pages (n.d.), <https://peraturan.bpk.go.id/Details/316698/pp-no-17-tahun-2025>.

³⁶ *Ibid.*, Paragraph 22.

The implementation of these regulations also encourages digital platform operators to close various loopholes that could potentially expose children to age-inappropriate content. One approach that can be taken is the implementation of age inference mechanisms behavior based age detection technology carried out through user age verification systems. This technology works by analyzing content consumption patterns, interaction activities, and platform usage behavior to estimate the user's actual age. This approach can minimize age manipulation practices that have long been used to access adult content. Through the implementation of this age verification mechanism, digital platform operators are expected to provide a more effective protection system for child users in the digital space.³⁷

Regulations regarding platform risk classification, parental consent, age restrictions for children, and age verification mechanisms are part of legal efforts to protect children in the digital space. These policies aim to ensure that children's use of digital technology remains grounded in the principle of the best interests of the child. This principle affirms that children must continue to benefit from technological advancements. At the same time, children must also be protected from various risks that could endanger their safety or development.

The effectiveness of these regulations depends heavily on the existence of oversight mechanisms that ensure their optimal implementation by electronic system operators. Without adequate oversight, the established provisions may not be fully enforced. Oversight of electronic system operators in the context of child protection is carried out by the Ministry of Communication and Digital Affairs. This agency has the authority to ensure that every electronic system operator complies with applicable regulations, particularly those related to child protection in the digital space. Through this oversight function, it is hoped that preventive normative provisions can be effectively implemented in the practice of operating digital platforms.

³⁷ Administrator, "Children Fake Their Ages, Platforms Urged to Detect Behavior" Komdigi.go.id, 2026, <https://www.komdigi.go.id/berita/siaran-pers/detail/anak-palsukan-usia-platform-diminta-deteksi-perilaku>. (accessed 1 April 2026).

The Ministry of Communication and Digital plays a role in receiving reports or complaints regarding alleged violations committed by electronic system operators. The Ministry of Communication and Digital also evaluates the compliance of electronic system operators and takes enforcement actions if violations are found.³⁸ Oversight serves not only as a control mechanism but also as a tool to ensure the sustained effectiveness of child protection in the digital space. This role underscores that oversight is closely intertwined with law enforcement mechanisms as part of a comprehensive child protection system.

The Ministry of Communication and Digital Affairs may impose administrative sanctions if it finds a digital platform that does not comply with the provisions of Government Regulation No. 17 of 2025. The imposition of such sanctions is part of the law enforcement mechanism aimed at ensuring that every operator of an electronic system fulfills its obligations properly in providing protection for children as a vulnerable group in the digital space. The sanctions that may be imposed are progressive in nature, corresponding to the severity of the violation, ranging from written warnings, administrative fines, temporary suspension of services or the platform, to termination of access to the digital platform, as stipulated in Articles 38 through 46.³⁹ The implementation of these tiered sanctions is intended to encourage digital platform operators to promptly make improvements to systems and policies that could pose risks to children, particularly regarding content moderation, age verification mechanisms, and the protection of children's personal data.

From a child protection perspective, sanctions serve as a crucial tool to ensure that digital platforms do not neglect children's safety and best interests in the provision of their services. The enforcement of these sanctions reflects the state's responsibility in creating a safer digital space

³⁸ Indonesian Government, "Government Regulation (PP) Number 17 of 2025 concerning the Governance of Electronic Systems for Child Protection" Paragraph 28 Pub. L. No. State Gazette 2025 No. 36, Supplement to State Gazette No. 7105: 34 pages (n.d.), <https://peraturan.bpk.go.id/Details/316698/pp-no-17-tahun-2025>.

³⁹ *Ibid.*, Paragraph 38-Paragraph 46.

for children. The sanction provisions in Government Regulation No. 17 of 2025 serve not only as a law enforcement mechanism. These provisions also constitute a preventive measure to ensure the fulfillment of children's right to protection in the digital environment.

The effectiveness of these administrative sanctions still raises some fundamental issues. Existing regulations on sanctions tend to focus on the administrative compliance of electronic system operators without providing clarity regarding the state's role when violations against children have occurred. These sanctions primarily serve as a tool for regulating electronic system operators and do not directly address the protection of victims. There is currently no clarity regarding mechanisms for recovery and compensation for affected children, resulting in an imbalance between the interests of system regulation and the best interests of the child.

These limitations are closely tied to the institutional aspects of oversight, which to date remain centralized within the Ministry of Communication and Digital Affairs. This centralization of authority indicates that the oversight system outlined in Government Regulation No. 17 of 2025 has not yet been fully designed to address violations that directly impact children as victims. In practice, the handling of violations cannot stop at imposing sanctions on electronic system operators but requires follow-up mechanisms that ensure the tangible protection and recovery of victims. Government Regulation No. 17 of 2025 has not explicitly designated an institution with the specific authority to receive, investigate, and follow up on reports of such violations. This situation creates a gap in the handling mechanism that has the potential to hinder the optimal fulfillment of children's rights.

The urgency of establishing an independent data supervisory authority is becoming increasingly relevant. The existence of such an independent body not only serves to strengthen oversight but also ensures the availability of accountable mechanisms for addressing violations that prioritize the best interests of the child. Ideally, this institution should have the authority to

receive complaints, conduct investigations, and ensure follow-up through to the stage of restoring the victim's rights. The absence of an independent authority means that the protection system under Government Regulation No. 17 of 2025 risks being incomplete, as it places greater emphasis on regulating electronic system operators rather than ensuring the fulfillment of children's rights as victims.

This situation indicates that the issues with Government Regulation No. 17 of 2025 lie not only in the existence of the regulations themselves, but also in an implementation design that has yet to bridge the gap between administrative compliance and substantive protection for children. Government Regulation No. 17 of 2025 will only achieve its objectives if it is implemented effectively, proportionally, and consistently. Ambiguity and imbalance in its implementation have the potential to prevent this regulation from providing optimal protection for children. This situation could also lead to outcomes contrary to the original intent, where protection remains merely administrative while risks to children persist and their space for participation in the digital realm becomes increasingly limited. The quality of the formulation and implementation of subsidiary regulations is a determining factor in the success of the implementation of Government Regulation No. 17 of 2025.

The author argues that the success of child protection in the digital space should be supported by effective and consistent implementation, as well as robust oversight, to ensure that all electronic system operators comply with established regulations. Strict law enforcement is necessary so that every violation can be subject to proportional sanctions while also serving as a deterrent. Therefore, strengthening the implementation aspect is imperative so that Government Regulation No. 17 of 2025 does not remain merely a normative framework, but truly functions as an effective protection instrument in practice.

2. A Comparison of Legal Protection for Children's Personal Data in the Digital Age Under Government Regulation Number 17 of 2025 and the European Union's General Data Protection

Government Regulation No. 17 of 2025 in Indonesia and the General Data Protection Regulation in Europe were essentially both designed to ensure comprehensive protection of children's personal data as a vulnerable group. Although they share similar objectives, these similarities do not necessarily result in identical regulatory approaches. The differences between these two legal frameworks can be outlined as follows:

a. Age Restrictions

Government Regulation No. 17 of 2025 sets out detailed age restrictions for users through the segmentation of age groups: 3 to 5 years, 6 to 9 years, 10 to 12 years, 13 to 15 years, and 16 to 18 years, as stipulated in Article 20 Paragraph (2). This grouping is linked to the types of services accessible and the platform's risk level, reflecting the state's efforts to provide more specific protection based on children's developmental stages.⁴⁰ Meanwhile, the General Data Protection Regulation through Article 8 sets the minimum user age at 16 years. This provision allows member states flexibility to set a lower age limit, provided it is not less than 13 years.⁴¹

b. Age Verification

The provisions regarding parental or guardian control in Government Regulation No. 17 of 2025 and the General Data Protection Regulation both identify parental consent as a key element in the protection of children in

⁴⁰ Indonesian Government, "Government Regulation (PP) Number 17 of 2025 concerning the Governance of Electronic Systems for Child Protection" Paragraph 20 Pub. L. No. State Gazette 2025 No. 36, Supplement to State Gazette No. 7105: 34 pages (n.d.), <https://peraturan.bpk.go.id/Details/316698/pp-no-17-tahun-2025>.

⁴¹ United Kingdom, "General Data Protection Regulation of 2016 Uni Eropa" Paragraph 8, https://gdpr-info.eu/?utm_source=ai-act-law.eu.

the digital space. Government Regulation No. 17 of 2025 through Article 2 Paragraph (4), letter b, requires the involvement of parents or guardians in verifying the age of child users as a preventive control measure to limit and guide children's access when using digital services.⁴² Meanwhile, the General Data Protection Regulation, through Article 8 Paragraphs (1) and (2), explains that parental consent must be verified through reasonable efforts. This provision relates to the lawfulness of data processing as stipulated in Article 6 Paragraph (1), letter a regarding the provision of consent as a lawful basis, so that the parental control role is not merely a formality.⁴³

c. Reporting Features and Complaint Mechanisms

Government Regulation No. 17 of 2025 provides a mechanism for parties who feel they have been harmed by actions of electronic system operators suspected of violating their obligations to file a complaint with the Ministry of Communication and Digital Affairs as the competent authority, as stipulated in Article 28.⁴⁴ Such complaints are then addressed through government oversight mechanisms, which may result in the imposition of administrative sanctions if a violation is proven. This mechanism primarily focuses on enforcing compliance by electronic system operators and does not explicitly address the form of redress for victims as the aggrieved parties. Furthermore, Government Regulation No. 17 of 2025 also does not provide explicit provisions regarding the right to data erasure (right to be forgotten) for children once a violation has occurred. The absence of such provisions is feared to have serious implications, namely the indefinite

⁴² Indonesian Government, "Government Regulation (PP) Number 17 of 2025 concerning the Governance of Electronic Systems for Child Protection" Paragraph 2 Pub. L. No. State Gazette 2025 No. 36, Supplement to State Gazette No. 7105: 34 pages (n.d.), <https://peraturan.bpk.go.id/Details/316698/pp-no-17-tahun-2025>.

⁴³ United Kingdom, "General Data Protection Regulation of 2016 Uni Eropa" Paragraph 6, https://gdpr-info.eu/?utm_source=ai-act-law.eu.

⁴⁴ Indonesian Government, "Government Regulation (PP) Number 17 of 2025 concerning the Governance of Electronic Systems for Child Protection" Paragraph 28 Pub. L. No. State Gazette 2025 No. 36, Supplement to State Gazette No. 7105: 34 pages (n.d.), <https://peraturan.bpk.go.id/Details/316698/pp-no-17-tahun-2025>.

retention of data without a clear time limit (data persistence) and the potential for the reuse of data beyond its original purpose (secondary use).⁴⁵

The General Data Protection Regulation provides more comprehensive provisions regarding the protection and redress of children. Article 79 of the General Data Protection Regulation stipulates that data subjects who believe their rights have been infringed upon in the processing of personal data are entitled to redress.⁴⁶ Such redress generally includes corrective measures such as data rectification and data erasure (the right to be forgotten), as provided for in Article 17 paragraph (1) point (d).⁴⁷ Article 82 further stipulates that any person who has suffered material or non-material damage is entitled to compensation. Such compensation is to be borne by the data controller or processor for the damages caused.⁴⁸

d. Regulatory Authority

The most striking difference between the two regulations lies in the existence of an independent supervisory authority. Government Regulation No. 17 of 2025 does not provide for the establishment of an independent supervisory body therefore, the functions of supervising and overseeing the implementation of data protection fall under the authority of the Ministry of Communication and Digital Affairs, as stated in Article 24 Paragraph (1).⁴⁹ This centralized oversight model has the potential to create limitations

⁴⁵ Ahmad Sukron Nu`man Arif, Wiwin Ariesta, "Comparative Study of Legal Protection of Personal Data in the European Union and Indonesia in the Principle of The Right to Be Forgotten According to Article 26 of Law Number 19 of 2016 concerning Amendments to Law Number 11 of 2008 concerning Amendments to Law Number 11 of 2008 concerning Electronic Information and Transactions," *Scientific Journal of Law* 6, no. 2 (2024): 162–77, <https://doi.org/https://doi.org/10.51213/yurijaya.v6i2.160>.

⁴⁶ United Kingdom, "General Data Protection Regulation of 2016 Uni Eropa" Paragraph 79, https://gdpr-info.eu/?utm_source=ai-act-law.eu.

⁴⁷ Johanna Chamberlain Jane Reichel, "The Relationship Between Damages and Administrative Fines in the EU General Data Protection Regulation The Relationship Between Damages and Protection Regulation," *Stockholm Faculty of Law*, no. 72 (2019), <https://doi.org/10.2139/ssrn.3447854>.

⁴⁸ United Kingdom, "General Data Protection Regulation of 2016 Uni Eropa" Paragraph 82, https://gdpr-info.eu/?utm_source=ai-act-law.eu.

⁴⁹ Indonesian Government, "Government Regulation (PP) Number 17 of 2025 concerning the Governance of Electronic Systems for Child Protection" Paragraph 24 Pub. L. No. State Gazette 2025 No. 36, Supplement to State Gazette No. 7105: 34 pages (n.d.), <https://peraturan.bpk.go.id/Details/316698/pp-no-17-tahun-2025>.

regarding independence, which could ultimately impact the effectiveness of data protection enforcement, particularly for children as subjects requiring special protection. In contrast, the General Data Protection Regulation explicitly mandates the establishment of an independent supervisory authority under Article 51. The European Data Protection Supervisor serves as a specialized supervisory body with broad authority to carry out oversight, investigations, and enforcement functions.⁵⁰

e. Penalties

Law enforcement measures are implemented by imposing administrative sanctions if a violation of the obligations established for electronic system operators is proven. Government Regulation No. 17 of 2025, in Articles 38 through 46, sets out a graduated scale of sanctions, ranging from written warnings, administrative fines, temporary suspension of services, to termination of access.⁵¹

These provisions indicate that sanctions are intended as a means of fostering compliance, with a graduated enforcement mechanism designed to encourage improvements by data controllers. In contrast, Article 83 of the General Data Protection Regulation establishes administrative sanctions in the form of significant fines that can reach 20,000,000 EUR or 4% of a company's annual global revenue, while taking into account the severity of the violation, the duration of the breach, and its impact on data subjects.⁵² This difference indicates that the General Data Protection Regulation emphasizes accountability through strong financial pressure, whereas Government Regulation No. 17 of 2025 is more oriented toward a phased approach to fostering compliance.

⁵⁰ United Kingdom, "General Data Protection Regulation of 2016 Uni Eropa" Paragraph 51, https://gdpr-info.eu/?utm_source=ai-act-law.eu.

⁵¹ Indonesian Government, "Government Regulation (PP) Number 17 of 2025 concerning the Governance of Electronic Systems for Child Protection" Paragraph 46 Pub. L. No. State Gazette 2025 No. 36, Supplement to State Gazette No. 7105: 34 pages (n.d.), <https://peraturan.bpk.go.id/Details/316698/pp-no-17-tahun-2025>.

⁵² United Kingdom, "General Data Protection Regulation of 2016 Uni Eropa" Paragraph 83, https://gdpr-info.eu/?utm_source=ai-act-law.eu.

The author analyzes that Government Regulation No. 17 of 2025 in Indonesia and the General Data Protection Regulation in Europe essentially share the same objective: to provide protection for the personal data of children as a vulnerable group in the digital space. However, there are differences in the implementation of such protection: the General Data Protection Regulation emphasizes substantive protection through the recognition of the right to rectification, the right to erasure, and the existence of an independent supervisory authority with strong powers. Meanwhile, Government Regulation No. 17 of 2025 is more focused on ensuring compliance by electronic system operators and centralized oversight. Government Regulation No. 17 of 2025 should adopt a more comprehensive approach, similar to the General Data Protection Regulation, particularly in strengthening the right to rectification and independent oversight, so that the protection of children in the digital space can be more effective and sustainable.

Conclusion

The protection of children's personal data under Government Regulation No. 17 of 2025 includes age limits and verification, parental consent, reporting mechanisms, oversight, and administrative sanctions for electronic system operators. However, these provisions do not yet include adequate redress mechanisms for children as aggrieved parties in the event of a personal data breach. This regulation does not explicitly address mechanisms for the restoration of rights, compensation, or the deletion of data affected by a breach. Additionally, oversight functions remain centralized within the Ministry of Communication and Digital Affairs without a dedicated independent authority.

A comparison between Government Regulation No. 17 of 2025 and the General Data Protection Regulation reveals that the General Data Protection Regulation not only establishes a prevention-based protection system but also emphasizes mechanisms for the restoration of rights—

including the right to compensation—the existence of an independent supervisory authority, and explicit recognition of the right to be forgotten. This approach represents more comprehensive protection compared to Government Regulation No. 17 of 2025. This indicates that the provisions in Government Regulation No. 17 of 2025 still need to be strengthened so that they do not focus solely on preventive aspects but are also capable of providing responsive protection against harm experienced by children in the digital space, thereby creating more comprehensive protection of children's personal data.

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