

**STRATEGIES TO IMPLEMENT DATA PROTECTION: A COMPARATIVE STUDY  
BETWEEN INDONESIA AND MALAYSIA**

**Undergraduate Thesis**



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**Constitutional Law**

**Universitas Muhammadiyah Yogyakarta**

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## THE AUTHENTICITY OF UNDERGRADUATE THESIS

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The author declares that the writing of this thesis is based on the results of my research, thoughts and original presentation. To the best of my knowledge, no works or opinions are written and published by other people except as references or quotations by following the usual procedures for writing scientific papers.

The author makes this statement truthfully, and if in the future there are irregularities and untruths in this statement, then I am willing to accept academic sanctions in the form of revocation of the degree that has been obtained because of this paper and other sanctions by the regulations in force at the Universitas Muhammadiyah Yogyakarta.

Thus, the author makes this statement in a conscious state without coercion from any party.

Yogyakarta, 6 September 2023



Muhammad Nur Rifqi Amirullah  
NIM. 20190610067

## MOTTO PAGE

*Say, 'O Prophet, that Allah says,' "O My servants who have exceeded the limits against their souls! Do not lose hope in Allah's mercy, for Allah certainly forgives all sins.1 He is indeed the All-Forgiving, Most Merciful.*

*(Surah Az Zumar 39:53)*



## DEDICATION

Praise be to Allah *Subhanahu Wa Ta'ala*, Lord of the Universe, and peace be upon His most beloved prophet and messenger, Muhammad, and all his family and companions. Upon the accomplishment of my undergraduate thesis, I would like to dedicate this to:

1. Almighty Allah, the Most Merciful and Most Generous.
2. The best parents that I could ever had, Drs. Amirullah, M.Pd and Nurbaeti Mappellawa, S.E.
3. My one and only brother, Muhammad Nur Hafizh Amirullah.



## FOREWORD

*Assalamualaikum Warahmatullahi Wabarakatuh*

Praise and gratitude to the presence of Allah SWT who always bestows His mercy, grace and love so that the author can finish writing this thesis entitled **"STRATEGIES TO IMPLEMENT DATA PROTECTION: A COMPARATIVE STUDY BETWEEN INDONESIA AND MALAYSIA"**. This legal writing is structured to complete the requirements for obtaining a Bachelor of Law degree at the Faculty of Law, Universitas Muhammadiyah Yogyakarta. Blessings and greetings may always be bestowed upon the Prophet Muhammad SAW, his family, his companions, and his people until the end of time.

The writer is very aware that there are still many shortcomings in this thesis, therefore the writer really hopes for input and suggestions for the perfection of this thesis. On this occasion the author would like to thank infinite to those who have helped and guided in completing this thesis. Thanks are given to:

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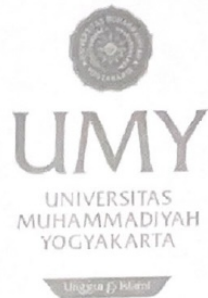
Finally, may Allah SWT bless this writer's writing and hopefully this writing can be a useful reference for younger students of the Faculty of Law, especially the Faculty of Law, Universitas Muhammadiyah Yogyakarta, thank you.

*Wassalamu'alaikum Warahmatullahi Wabarakatuh*

Yogyakarta, 6 September 2023



Muhammad Nur Rifqi Amirullah  
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## LIST OF ABBREVIATIONS

ASEAN	: Association of Southeast Asian Nations
APEC	: Asia Pacific Economic Cooperation
APJII	: Association of Internet Service Providers
BPJS	: <i>Badan Penyelenggara Jaminan Sosial</i> (Healthcare and Social Security Agency)
BSI	: <i>Bank Syariah Indonesia</i>
EU	: European Union
GDPR	: General Data Protection Regulation
JPDP	: <i>Jabatan Perlindungan Data Pribadi</i> (Malaysia's Department of Personal Data Protection)
E-KTP	: <i>Elektronik Kartu Tanda Penduduk</i> (Electronic Identity Card)
KKMM	: <i>Kementerian Komunikasi dan Multimedia Malaysia</i> (Malaysia's Ministry Communications and Multimedia)
OECD	: Organization for Economic Cooperation and Development
OJK	: <i>Otoritas Jasa Keuangan</i> (Financial Services Authority)
PDP	: Personal Data Protection
PDPA	: Personal Data Protection Act
PDPO	: Personal Data Privacy Ordinance
RFID	: Radio Frequency Identification