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Exceptions to the Right to Be Forgotten in Relation to Press Freedom in the Digital Era

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Abstract: The rapid development of technology has significantly transformed the dissemination and accessibility of information in Indonesia. With 77% of the population being internet users in 2023, issues surrounding personal data protection and freedom of the press are becoming increasingly critical. The "Right to be Forgotten" (RTBF), inspired by the European Union's GDPR framework, has been incorporated into Indonesia's Personal Data Protection Act No. 27 of 2022. This legislation grants individuals the right to erase personal data under certain conditions. However, this right faces challenges when it intersects with press freedom, a cornerstone of democracy. The Indonesian law does not explicitly address the exemption of RTBF in the context of freedom of expression and public interest reporting, unlike the GDPR. This gap potentially poses a threat to journalistic activities, especially in reporting sensitive issues like legal proceedings or public figures' misconduct. This study employs a legal research method with statute, conceptual, and comparative approaches to analyze this intersection. The findings highlight the need for balanced regulations that protect personal privacy without undermining press freedom. As such, considering technological advancements and societal needs, is essential for ensuring the coexistence of these fundamental rights.

Keyword: Right to be Forgotten, Freedom of the Press, Personal Data Protection, GDPR, Legal Framework, Indonesia.

INTRODUCTION

Nowadays, the availability of information is very easy and the ease of achieving access to it causes no more restrictions that become obstacles in achieving information. Not only information presented in print media but also in other electronic mass media. Even the trend of the technological age has led to the loss of mankind's dependence on paper or printed materials to disseminate other information so that in this era it can be said that we are experiencing a paperless period.

As per information from dataindonesia.id, the amount of internet users in Indonesia is predicted to reach 212 million by the year 2023, as reported by We Are Social, a data company from the United States. As of January 2023, Indonesia has over 212.9 million internet users,

showing that around 77% of the population in the country can access the internet. The number of internet users in January 2023 has seen a 3.85% growth compared to the previous year. In January of the year 2022, Indonesia had a total of 205 million internet users. The ongoing trend suggests a steady increase in the internet user population of Indonesia annually. The surge in internet users in the country first started in 2017. The average amount of time Indonesians devote to using the internet each day is 7 hours and 42 minutes. Furthermore, almost all internet users in Indonesia, or 98.3%, access the internet through their mobile phones (Rizaty, 2023). This information shows that there is an increasing number of people who are able to discover and access information that is circulating.

The fast dissemination of information is closely linked to the swift advancement of technology, which brings numerous advantages to modern human existence. The impact of technology on daily life is evident in a wide range of sectors including transportation, tourism, commerce, finance, and governance. Improving the quality of the Indonesian community through sustainable use of information technology and science is a key goal of national development and a global issue (Sudaryanti et al., 2013).

The development of internet-based mass communication media that relies on speed is different from conventional media communication patterns that developed before the dominance of the internet era took place (Aziz, 2010). Internet-based technology makes the transmission or delivery of news almost does not require a time lag or real time. This kind of development then makes the world's life in global mass media which was previously dominated by conventional media such as print media, radio to television is now increasingly rivaled by the existence of internet-based media.

This then raises a stream of awareness of news issues that can be accessed anywhere and anytime, including in terms of obtaining it (Sidabutar et al., 2024). Human Personal Data is an important identity indicator for individuals that makes them easy or difficult to recognize (Djafar, 2019). As per the explanation given in Law Number 27 of 2022 on Personal Data Protection (referred to as PDP Law), personal data refers to information pertaining to individuals that can identify them either on its own or when combined with other data, whether through electronic or non-electronic means.

Based on the many cases of personal data leaks that have occurred, it shows that the right to privacy of Indonesian citizens is very vulnerable to abuse, which can harm the community. In addition, personal data breaches are not only caused by personal data leaks. Violations can also occur in terms of irresponsible processing of personal data. For instance, if individuals' private information is exploited for profit without a valid justification. The topic of safeguarding personal data has emerged as a significant concern in recent times. The extensive utilization of online platforms underscores the significance of preserving personal data to uphold data security (Lesmana et al., 2021).

To protect Personal Data, Indonesia has created and passed Law No. 27 of 2022 on Personal Data Protection (hereinafter abbreviated as PDP Law). Law No. 27 of 2022 on Personal Data Protection is a legal consequence of the Indonesian government's ratification of 4 (four) international conventions, namely the Universal Declaration on Human Rights (Article 12), the International Covenant on Civil and Political Rights (Article 17), the Convention on the Rights of the Child (Article 16) and the International Convention on the Protection of All Migrant Workers and Members of Their Families (Article 14). The PDP Law takes effect from the date of its promulgation on October 17, 2022. This legislation was created based on Article 28G of the Indonesian Constitution of 1945, which grants individuals the right to safeguard themselves, their families, their reputation, their integrity, and their possessions. It also ensures that they are protected and secure from any form of intimidation that may hinder their ability to exercise their human rights.

The Indonesian government is motivated by the fast-paced advancements in technology to safeguard the personal information of its population. Safeguarding privacy equates to

upholding freedom of expression. This implies that privacy rights ensure defense against the intimidation of exercising basic human rights (Djafar et al., 2018).

Law Number 27 of 2022 has certain regulations on Personal Data Protection that have caught the public's interest, particularly in regards to the concept of the right to be forgotten. This concept was initially established in the European Union and the European Economic Area (EEA) through the General Data Protection Regulation (GDPR). The main goal of the GDPR is to safeguard the privacy and personal information of people residing in the EU and EEA. Individuals have the right to ask for the removal of their data, as guaranteed by the right to be forgotten. Article 17, subsection 3 of the GDPR specifies the situations where this right does not apply, providing clear instructions.

Paragraphs 1 and 2 do not apply if processing is needed:

- 1) to exercise the freedom of expression and access to information;
- 2) to meet a legal requirement that requires processing under Union or Member State law, which the controller must comply with or for tasks carried out in the public interest or in the exercise of official authority granted to the controller;
- 3) for public health reasons in line with points (h) and (i) of Article 9(2) and Article 9(3);
- 4) for public interest archiving, scientific or historical research purposes or statistical purposes according to Article 89(1) if paragraph 1 would hinder or seriously harm the achievement of those processing objectives; or
- 5) for the establishment, exercise, or defense of legal rights.

Article 17 of the GDPR focuses on removing personal information from the data controller's possession. This deletion is necessary when the data is no longer needed, the individual requests to opt out of data processing, the individual protests against data processing, the data was acquired unlawfully, or the data was initially collected for public service purposes (Lee et al., 2015). The individual has the ability to ask for their personal information to be removed from the data holder based on the reasons provided earlier.

Under the regulations set forth by the GDPR, people can request that the organization in charge of their data delete it, even if it is no longer needed for its initial purpose. They are also allowed to withdraw their consent for data processing if it is considered illegal (Black, 2020).

Then the next article not only discusses the deletion of personal data or what we can call the Right to be Forgotten, but Article 17 GDPR also discusses the invalidity of the Right to be forgotten, namely in Section 3 which explains that the previous provisions become invalid in several situations, one instance could be the usage of freedom of speech and access to information for the greater good, such as in the healthcare industry, legal disputes, and academic exploration of the past.

Indonesia has implemented the GDPR principles in the formation of Law Number 27 of 2022 regarding the protection of personal data, which includes features like the right to request deletion of personal information. According to Article 8 of the PDP Law, people are granted the authority to halt the processing, deletion, or eradication of their personal data in compliance with the regulations. Article 10 also details the ability of individuals to pursue legal recourse, as outlined in paragraph (1) which states that individuals have the right to challenge decisions made through automated processes that have legal implications or affect them significantly. The specific guidelines for this will be established in a government mandate.

There is an exception rule to the right to be forgotten in the PDP Law, namely in Article 15 with the following rules:

Article 15

1. The rights of Personal Data Subjects as referred to in Article 8, Article 9, Article 10 paragraph (1), Article 11, and Article 13 paragraphs (1) and (2) are exempted for:
 - a) National defense and security interests;
 - b) The interests of the law enforcement process;

- c) The public interest in the context of state administration;
 - d) The interests of supervision of the financial services sector, monetary, payment systems, and financial system stability carried out in the context of state administration; or
 - e) Statistical and scientific research interests
2. The exception as referred to in paragraph (1) shall be made only in the context of implementing the provisions of the Act.

The article discusses restrictions on the right to be forgotten, including exemptions for national security and defense, law enforcement, public interest in government operations, financial sector supervision, and research purposes in the context of state administration.

The author then finds a considerable difference between the PDP Law in Indonesia and the GDPR in the European Union, especially regarding exceptions to the Right to be Forgotten. In the GDPR, there is a paragraph that regulates the non-applicability of RTBF in matters of freedom of expression and information disclosure, while in the PDP Law in Indonesia there is no such regulation. This is certainly a problem when freedom of expression and information disclosure should be guaranteed today, it is also necessary to look back at the Press Law where the press has the discretion to continue to provide information to the public about matters that need to be known in general.

One of the personal data protections regulated in the PDP Law is found in Article 4 paragraph (2) which states that protected personal data includes crime records. The crime record referred to is a written record of a person who has committed an unlawful or unlawful act or is in the judicial process for the act committed, including police records and inclusion in the prevention or deterrence list. This is the explanation of Article 4 paragraph (2) letter d in the PDP Law.

Article 65, paragraph (1), presents a potential issue concerning the unauthorized acquisition or gathering of Personal Data for personal gain or to benefit others, leading to the risk of Personal Data Subjects losing their information. This is further outlined in Article 67 as a criminal offense within the PDP Law. As a result, the regulation of the PDP Law has the potential for the article to be vulnerable to abuse. As mentioned, Article 4 paragraph (2) letter d and Article 64 paragraph (4) of the PDP Law have the potential to threaten journalistic work in covering a personal data breach dispute in court.

Article 1 point 1 of Law No. 40 of 1999, also known as the Press Law, addresses the regulation of press freedom and outlines the purpose of the press. Within the article, it is stated that the press functions as a social institution and a means of mass communication. This involves engaging in various journalistic activities such as gathering, storing, and disseminating information through different mediums like writing, sound, images, and data. Furthermore, the Press Law highlights the importance of utilizing print media, electronic media, and other available channels to fulfill these journalistic activities.

Thus, the potential problems posed by the PDP Law on a person's criminal record, especially those that have received a court decision and then conveyed or announced the news in the electronic media in the context of carrying out the duties of the Press, can become a problem after the prisoner who is the owner of the personal data is declared to have completed serving his prison term.

METHOD

This study focuses on conducting legal research to address current legal problems by exploring legal regulations, principles, and doctrines to provide solutions to legal challenges (Marzuki, 2017). The issue at hand involves addressing the issue of freedom of the press in sharing restricted information due to Law No. 27 of 2023 on Personal Data Protection through a combination of legal, conceptual, and comparative approaches, ultimately leading to a prescriptive analysis.

This study involves legal research that challenges the conventional definition provided by Peter Marzuki. According to Marzuki, legal research entails identifying legal rules, principles, and doctrines to address legal questions (Marzuki, 2017). Legal research follows a prescriptive approach, where the anticipated response should include values or guidelines considered correct, suitable, unsuitable, or incorrect.

RESULTS AND DISCUSSION

The right to be forgotten in relation to freedom of the press

The idea of the right to erasure was initially acknowledged in a ruling by the Court of Justice of the European Union (CJEU) in 2014, which involved a legal dispute between Google Spain SL, Google Inc., the Agencia Española de Protección de Datos (AEPD), and Mario Costeja González. The CJEU ruled that search engines are also responsible for maintaining data security in search results. The judges interpreted several articles in EU Regime 95/46, namely Article 12(b) and Article 14, which demand that search engine service providers must remove all information related to a person's name that is associated with third-party web pages. The decision was made to safeguard the rights outlined in Article 7 (right to privacy) and Article 8 (protection of personal data) of the European Convention on Human Rights and Fundamental Freedoms (González, 2014).

The idea of the right to be forgotten stems from the argument that information can lose its relevance or veracity over time and should therefore be restricted (Villaronga et al., 2018). This right applies to both information stored manually in relation to offline and online information, especially in countries under EU personal data law (Rizqi et al., 2022).

In online data privacy cases, especially in countries under EU personal data law, this idea is considered more effective in restoring the dignity, humanity and good name of individuals who are defamed through personal information that is massively published online. Through the argument of rights protection, the process of reaching personal data in search engines is much narrower, faster and easier than conducting a "notice-and-take down" of the entire information spread in cyberspace (Djafar et al., 2018).

Freedom in this case contains two concepts that need to be understood, namely freedom and information, in this description there is a definition of the two words. Freedom is synonymous with *libertas* in foreign languages or freedom in English. The reason for mentioning two different languages is because the idea of freedom has been extensively developed in Western society in this modern age. This includes nations that primarily speak English, like England, America, Canada, and Australia. A comprehensive explanation of freedom consists of various aspects such as liberty, self-determination, and the absence of constraints which contrasts with the concept of slavery. Freedom also refers to the ability to act according to one's will without unnecessary limitations, except for those imposed by just laws and societal obligations. It also involves the presence of laws and institutions within a country that safeguard civil liberties for every individual (The Law Dictionary, 2024).

Freedom is defined as a state of being unrestricted, autonomous, self-ruling, free from constraints imposed by those in power, the antithesis of servitude. In addition, from the side of individuals who have freedom, this free condition is referred to as the power to act, without the supervision of others, without obstacles or restrictions other than those imposed by just laws and necessary obligations in social life. The spread of the idea of freedom has the possibility of being seized by the state or government on the basis of maintaining legal and institutional systems.

In principle, individual freedom can only be limited by just laws and the social obligations of individuals in society. Freedom here is clearly not without limits, although lawmaking is still required to maintain the spirit of freedom so that it can be enjoyed by individuals. Freedom is still considered a fundamental principle for individuals to develop themselves. Meanwhile, legal and social restrictions serve to prevent this freedom from

violating general rules and causing social chaos. This is in accordance with one of the objectives of law to maintain social order. The offense that is considered the heaviest in the creation of social order is crime. Crimes include behavior that has been prohibited by society because it threatens society's ability to maintain order.

Article 1 point 1 of Law No. 40 of 1999, also known as the Press Law, outlines the regulations for the press and defines the purpose of journalistic activities. It emphasizes that the press serves as a social institution and a means of mass communication, engaging in various activities such as gathering, storing, and transmitting information through different media channels like print and electronic (Wahidin, 2006).

The term press or press comes from the Latin term "Pressus" which means pressure, pressured, crushed, dense. Press in Indonesian vocabulary comes from the Dutch language which has the same meaning as the English "press", as a term for printing equipment. In the complete dictionary of the Indonesian language the word press is defined as, printing and publishing business. People engaged in broadcasting news are referred to as journalists or news broadcasters or journalists who deliver news through newspapers, magazines, television, radio, and so on (Abdillah & Prasetya, 2010).

One important aspect of democracy is freedom of opinion and expression. A democratic state should protect the freedom of assembly, expression and open discussion. This refers to the principle that in a democratic system, sovereignty rests with the people. Hence, safeguarding the right to freely express opinions and thoughts is vital in allowing for scrutiny, feedback, and guidance on matters of governance. This liberty empowers individuals to engage in discussions and consultations, ensuring that governmental actions align with the wishes of the public.

The ability to freely speak one's mind and access information based on personal beliefs is essential to ensuring fairness and honesty, improving societal well-being, and educating the population. In the context of social and state life, this freedom allows people to freely express ideas, debate and discuss various important issues, which in turn will support a healthy democratic process.

Freedom of expression is a practical reflection of individual rights and is one of the most fundamental forms of human rights. It is universally regulated by the constitutions of the world's countries, which are tailored to each country's political system. When studying the laws governing public information, it is impossible to ignore the political factors that in fact shape them (Muladi, 1993).

In Indonesia, the value of press freedom has been regulated in the amended 1945 Constitution, specifically in Article 28 E Paragraphs (2) and (3), as well as Article 28 F. In society, there is a difference between information conveyed through the press and the phenomenon of Trial by the Press, which is expressing opinions both orally and in writing. The implementation of Article 28 of the 1945 Constitution was realized with the issuance of Law No. 40/1999 on the Press. The press, which includes print, electronic and other media, is a means to convey thoughts orally and in writing. This indicates that the state recognizes freedom of expression and freedom of thought as part of a democratic and law-based state.

Freedom of the media is integral in ensuring human rights as stated in the Decree XVII/MPR/1998 of the People's Consultative Assembly of Indonesia. This freedom allows for the free flow of information. The principle being governed includes the entitlement of all individuals to communicate and access information, as stated in Article 19 of the United Nations Charter on Human Rights. This provision emphasizes that everyone is entitled to freedom of opinion, the ability to express thoughts, as well as seek, receive, and transmit information through any means, without being limited by geographical borders.

The press plays a crucial role in the judiciary by providing coverage of court proceedings, in line with the legal requirement for transparency unless there are moral or child-related issues. The media's involvement in promoting transparency is essential for upholding the principles of a democratic rule of law.

According to Prof. Oemar Seno Adji, the press has several important functions, namely as a critic, barometer, guide, and controller. However, the success or failure of the press in carrying out its functions is influenced by several factors. First, human factors as owners and organizers of the press. Second, the attitude of the authorities towards the press. Third, the level of progress of society. Fourth, the state of the available technical tools. The press freedom we enjoy today came after the fall of Soeharto in May 1998, which opened up space for the Indonesian press after more than three decades of restrictions.

Freedom of the press and the Right to be forgotten are linked to an individual's ability to obtain and share information, although they have distinct emphases. Freedom of the press pertains to the media's entitlement to seek, acquire, and distribute information without hindrance, a fundamental aspect of democracy. The media serves a vital function in representing public sentiment and monitoring the government, but there are occasions when this liberty conflicts with an individual's right to privacy, particularly when the disseminated information has a detrimental impact on someone.

The Right to be forgotten, however, grants individuals the privilege of asking for the deletion of insignificant or damaging personal details from search engine outcomes. Here, there is a tension between freedom of the press, which guarantees the right to disclose and disseminate information, and the right of individuals to protect themselves from harmful and irrelevant information. The interaction between these two can be observed in terms of how the legal system needs to weigh the public's need for information against an individual's right to not be overwhelmed by outdated information, such as in the case of persistent negative publicity affecting an individual's reputation.

Challenges of the Right to be Forgotten exception to freedom of press information in Indonesia

The issue of implementing the Right to be Forgotten exception in Indonesia poses a complex challenge as it involves the clash of two important principles: the safeguarding of individual privacy and the protection of press freedom essential for a democratic society. Article 28F of the 1945 Constitution guarantees freedom of the press, allowing for the expression of opinions and access to information through various media outlets. Conversely, the Right to be Forgotten, enshrined in the Personal Data Protection Law (UU PDP) No. 27 of 2022, grants individuals the right to request the removal of personal data that is outdated, inaccurate, or harmful to their reputation.

A major challenge arises when the two clash. Freedom of the press encourages the media to disseminate information widely and without limits, which often involves individuals' personal data. However, in some cases, the personal data disseminated can linger in the public and harm the individual, especially when the information disseminated is irrelevant or even false. This is where the Right to be Forgotten comes in to protect individuals from the adverse effects of information that continues to circulate online, but this can conflict with the principle of freedom of the press, which prioritizes the public's right to information.

In Indonesia, the Personal Data Protection Law No. 27 of 2022 is mainly concerned with protecting people's rights to manage their personal information. This includes the right to ask for outdated or unnecessary data to be deleted. As stated in Article 25 of the law, individuals can request the removal of their personal data if it does not meet data protection principles like accuracy, relevance, or suitability for its intended use. Nevertheless, this provision does not specifically address the importance of press freedom, which relies on the accessibility of information for public interest.

Meanwhile, the freedom of the press stipulated in Article 28F of the 1945 Constitution gives the media the right to convey information freely, including in the case of news involving individuals. In this context, Right to be Forgotten has the potential to conflict with the principle of freedom of the press, especially when information that has been published is considered

relevant for the public interest, even though it is old or personal. The media, as an institution that oversees the running of the government and conveys information to the public, often argues that the deletion of published information may hinder the public's right to know.

As stated in Article 26 of the PDP Law, personal data must be managed and processed only with the clear approval of the individual. This can be overridden in certain cases outlined by law, such as for legal reasons or public welfare. Nevertheless, the freedom of the press enshrined in the 1945 Constitution does not specifically address the safeguarding of personal data when it comes to media reporting. In this case, the Right to be Forgotten can threaten press freedom because it requires the deletion of information that has already been published, which the media may consider important for the public interest.

Article 28E section (3) of the 1945 Constitution also guarantees the freedom of speech and access to knowledge for all individuals. This article provides the basis for the freedom of the press to carry out its functions without interference or censorship. However, when the Right to be Forgotten is implemented, especially in cases involving the mass media, there is a tension between the protection of individual privacy rights and the freedom of the press to disseminate information that is considered important for the public interest. This can create a legal dilemma as to whether information that has already been published should be deleted or allowed to remain in the public interest.

In practical terms, the challenge of the Right to be Forgotten exception to the freedom of the press in Indonesia has arisen in several cases. One example is in news reports involving public figures or government officials, where published information becomes highly relevant in the context of transparency and accountability. While the individual may wish to remove their personal data for privacy reasons, freedom of the press will emphasize the importance of the information to the public. This is even more complex if the information has been published for a long time and continues to be found on search engines or social media.

Ultimately, despite the safeguards offered by the PDP Law for personal information and the ability to be erased from public record, the enforcement of the Right to be Forgotten in Indonesia encounters significant obstacles due to conflicts with the fundamental tenet of press freedom. To balance these two interests, clearer rules regarding exceptions to the right to be forgotten in the context of information relating to public interest and democracy are needed. Therefore, it is important for the government and relevant institutions to develop regulations that can accommodate these two rights in a balanced manner, ensuring freedom of the press while also protecting the privacy rights of individuals in light of advancements in information and communication technology.

In addition, other challenges arise related to the existence of digital platforms and search engines such as Google, which facilitate access to personal information that has been published. In this regard, the Right to be Forgotten is faced with the difficulty of removing information that has been widely disseminated in cyberspace, particularly in relation to mass media. While freedom of the press allows such information to continue to be disseminated as part of the public record, the application of the right to be forgotten in this context is often problematic, given that personal data that already exists on the internet is difficult to erase completely. In practice, even if a person successfully requests the removal of information from one site or platform, the information may still be found elsewhere, which complicates the effective application of the Right to be Forgotten.

Further challenges arise when taking into account the role of social media in the dissemination of personal information. Social media allows users to openly share their personal data or inadvertently spread information that should be protected. In this context, while the Right to be Forgotten gives individuals the right to remove harmful data, social media, which prioritizes freedom of expression and information sharing, often faces difficulties in balancing both rights. Hence, Indonesia needs to develop a more holistic approach in regulating the right to be forgotten, taking into account the impact of the development of digital technology,

including the role of social media, while still respecting freedom of the press, which is a basic right in a democratic state.

CONCLUSION

In conclusion, the Right to be Forgotten exception to the freedom of press information in the digital age poses significant challenges relating to the protection of individual privacy rights and press freedom. In Indonesia, although the Personal Data Protection Law (UU PDP) provides space for individuals to delete information that is no longer relevant, the implementation of this right often clashes with the freedom of the press guaranteed by the constitution, especially when the published information relates to the public interest and democracy.

In the digital age, where information can be widely disseminated through social media and online platforms, the challenges are increasingly complex. Personal information that has been published by the media or individuals on the internet is often difficult to erase completely, which complicates the application of the Right to be Forgotten. Therefore, there needs to be a balance between the protection of privacy rights and press freedom, taking into account the public interest as well as the role of digital technology in the dissemination of information. The government and relevant agencies should develop clearer regulations to address this clash, while maintaining press freedom as a pillar of democracy and respecting individual privacy rights.

REFERENCE

- Abdillah, P., & Prasetya, D. (2010). *Kamus Besar Bahasa Indonesia*. Surabaya: Arkola.
- Aziz, N. M. (2010). *Laporan Pengkajian Hukum Tentang Menginventarisir Seluruh Lingkup Yang Menjadi Persoalan Di Bidang Pers*. Badan Pembinaan Hukum Nasional Departemen Hukum Dan HAM.
- Black, S. (2020). The implications of digital collection takedown requests on archival appraisal. *Archival Science*, 20(1), 91–101.
- Djafar, W. (2019). *Hukum perlindungan data pribadi di indonesia: lanskap, urgensi dan kebutuhan pembaruan*. Seminar Hukum Dalam Era Analisis Big Data, Program Pasca Sarjana Fakultas Hukum UGM, 26.
- Djafar, W., Amri, A. B., Ditya, G. Y., & Wahyudin, A. (2018). *Hak Atas Penghapusan Informasi di Indonesia: Orisinalitas dan Tantangan dalam Penerapannya*. Jakarta Selatan: Lembaga Bantuan Hukum Pers (LBH Pers).
- González, M. C. (2014). *Putusan CJEU Google Spain SL, Google Inc. versus Agencia Española de Protección de Datos (AEPD)*. http://curia.europa.eu/juris/document/document_print.jsf?do-clang=EN&docid=152065
- Lee, H. J., Yun, J. H., Yoon, H. S., & Lee, K. H. (2015). The right to be forgotten: Standard on deleting the exposed personal information on the Internet. *Computer Science and Its Applications: Ubiquitous Information Technologies*, 883–889.
- Lesmana, C. S. A. T., Elis, E., & Hamimah, S. (2021). Urgensi Undang-Undang Perlindungan Data Pribadi dalam menjamin keamanan data pribadi sebagai pemenuhan hak atas privasi masyarakat Indonesia. *Jurnal Rechten: Riset Hukum Dan Hak Asasi Manusia*, 3(2), 1–6.
- Marzuki, P. M. (2017). *Penelitian Hukum (13th ed.)*. Kencana.
- Muladi. (1993). *Delik Pers Dalam RUU KUHP*. Universitas Gadjah Mada.
- Rizaty, M. A. (2023). *Pengguna Internet di Indonesia Sentuh 212 Juta pada 2023*. <https://dataindonesia.id/digital/detail/pengguna-internet-di-indonesia-sentuh-212-juta-pada-2023>
- Rizqi, L. A. M., Fahrezi, S. R., & Permatasari, T. I. D. C. (2022). Pengejawantahan EU GDPR dalam RUU Perlindungan Data Pribadi: Penguatan Perlindungan Data Pemilih oleh KPU. *Jurist-Diction*, 5(1).

- Sidabutar, W. P., Nita, S., & Yopik Gani. (2024). Social Media Analysis of the Public Relations Division of the Indonesian National Police in the Ketupat Operation 2024 Using Intelligence Socio Analytic (ISA). *Policy, Law, Notary and Regulatory Issues*, 3(4), 543–558. <https://doi.org/10.55047/polri.v3i4.1522>
- Sudaryanti, K. D., Darmawan, N. K. S., & Purwanti, N. P. (2013). Perlindungan Hukum Terhadap Investor Dalam Perdagangan Obligasi Secara Elektronik. *Kertha Wicara*, 2(1), 1–5.
- The Law Dictionary. (2024). What is the meaning of FREEDOM Definition and Legal Meaning. <https://thelawdictionary.org/freedom/>
- Villaronga, E. F., Kieseberg, P., & Li, T. (2018). Humans forget, machines remember: Artificial intelligence and the right to be forgotten. *Computer Law & Security Review*, 34(2), 304–313.
- Wahidin, S. (2006). *Hukum pers*. Pustaka Pelajar.