



When Customer Accounts Go ‘Mati Surr’: Multiple Interpretations of Privacy and the Confusion of Indonesian Cyber Law

Muh. Akbar Fhad Syahril¹, Anatolijs Kriviņš²

ARTICLE INFO

Keywords:

Dormant Accounts; Customer Privacy; Indonesian Cyber Law.

How to cite:

Syahril, M.A.F. Kriviņš, A. (2025). When Customer Accounts Go ‘Mati Surr’: Multiple Interpretations of Privacy and the Confusion of Indonesian Cyber Law. *Amsir Law Journal*, 7(1), 1-11.

DOI:

10.36746/alj.v5i1...

Received:

July 07, 2025

Accepted:

October 29, 2025

Published:

October 30, 2025

ABSTRACT

This article examines the complex legal and practical challenges arising from the implementation of dormant account blocking policies by financial institutions in Indonesia, an increasingly urgent issue amid the acceleration of digital banking and the intensification of cybercrimes. Using a normative juridical approach supported by statutory and case analysis, the research scrutinises the intersection between the need to combat financial crimes and the imperative to protect customers' privacy rights under Indonesian cyber law. The findings reveal that while dormant account blocking is effective in mitigating illegal acts, such as money laundering and misuse of digital financial accounts, it often raises procedural and ethical issues, including a lack of notification, inconsistent legal implementation, and potential infringement on consumers' rights to privacy and access. These gaps lead to eroded public trust in digital banking due to uncertainty and the risk of arbitrary administrative action. The study recommends harmonisation of regulations and standard operating procedures among banks, enhanced dispute resolution mechanisms, and strengthened protection of customers' legal and privacy rights, particularly through improved transparency and digital literacy initiatives. The article contributes an integrative conceptual model balancing risk-based financial legislation and rights-based legal protection, offering a new legal framework better suited to Indonesia's evolving financial digital landscape.

Copyright © 2025 ALJ. All rights reserved.

1. Introduction

The issue of blocking dormant accounts in Indonesia is now increasingly important to study, along with the increasing number of actions by the Financial Transaction Reports and Analysis Centre (PPATK), which temporarily stops transactions on inactive accounts to maintain the integrity of the financial system and prevent misuse of accounts by irresponsible

¹ Faculty of Law Institut Ilmu Sosial dan Bisnis Andi Sapada, Parepare, Indonesia. E-mail: akbar2.a2@gmail.com

² Dangaupils University, Latvia, Email: anatolijs777@gmail.com

parties.³ This policy, although intended for public protection, has given rise to polemics regarding customer privacy rights in the complex realm of cyber law, especially in the era of rapidly developing banking digitalisation.⁴

On the other hand, domestic banking is also actively providing regulatory support through the dormant account mechanism, namely designating accounts that have been inactive for at least three months as potential objects for blocking.⁵ This refers to efforts to promote the principles of Know Your Customer (KYC) and Customer Due Diligence (CDD) across the board.⁶ This procedure is not only aimed at securing funds, but also at reducing the risk of criminal activity, from money laundering, narcotics transactions, to the practice of buying and selling fake accounts.

Contemporary literature highlights that the implementation of dormant account blocking has significantly reduced online gambling and other digitally based illegal activities that often exploit gaps in dormant accounts. However, experts point out that dormancy criteria and parameters often target accounts that customers still need for long-term financial planning, such as education savings or emergency funds.⁷ Therefore, this policy is not necessarily free from the potential to harm the wider community.

A legal normative review in various studies reveals several contradictions between the unilateral blocking policy and the provisions of Article 25 of the OJK Regulation concerning Consumer Protection in the Financial Services Sector, which essentially requires banks to maintain the security and confidentiality of customer funds.⁸ Also, Article 40 of the Banking Law confirms the status of bank secrecy and can only be disclosed in a limited manner based on specific legal provisions.

Some previous studies have concluded that public protection efforts through account freezing have not been fully effective, considering the weak notification mechanisms and transparency of the process, and often cause inconvenience and even public unrest, especially when the blocked account turns out to be used for daily needs or social assistance that has not been distributed.⁹ ¹⁰ Implementation in the field also still encounters obstacles due to a lack of communication between authorities and the community, and minimal legal protection in the scenario of blocking without prior notification.

Furthermore, previous research is limited by the lack of a systematic evaluation of the interrelationships between customer personal data protection, the effectiveness of dormant account procedures, and the right to access justice, which should be guaranteed under the principles of due process and non-discrimination. In the context of cyber and privacy law, this policy appears to be insufficient in utilising a legal framework that is adaptive to digital risks, including the provisions of the ITE Law, the Personal Data Protection Law, and the Financial Services Authority's standardisation.

³ Gibran Maulana Ibrahim, (2025). *Soal Pemblokiran Rekening Dormant*, PPAATK *Bicara Lindungi Hak Nasabah*. From: <https://news.detik.com/berita/d-8037905/soal-pemblokiran-rekening-dormant-ppatk-bicara-lindungi-hak-nasabah>.

⁴ PPAATK. (2025). *PPATK Hentikan Sementara Transaksi Rekening Dormant Untuk Lindungi Kepentingan Publik*. From: https://www.ppatk.go.id/siaran_pers/read/1476/ppatk-hentikan-sementara-transaksi-rekening-dormant-untuk-lindungi-kepentingan-publik.html

⁵ Buana, H. (2023). *Tanggung Jawab Bank dalam Pelanggaran Prinsip Kehati-hatian pada Pemblokiran Rekening Nasabah Salah Sasaran* (Doctoral dissertation, Universitas Islam Indonesia).

⁶ CNN Indonesia. (2025). *Pengertian Rekening Dormant yang Terancam Kena Blokir PPAATK*. From: <https://www.cnnindonesia.com/ekonomi/20250730105429-78-1256605/pengertian-rekening-dormant-yang-terancam-kena-blokir-ppatk>.

⁷ Wulandari, I., & Sembiring, A. (2022). Analisis Perlindungan Nasabah atas Pemblokiran Rekening Dormant di Era Digital Banking. *Jurnal Hukum & Bisnis*, 9(1), 55-69.

⁸ *Vide* Pasal 25 Peraturan OJK No.1/7/POJK.07/2013 tentang Perlindungan Konsumen Sektor Jasa Keuangan

⁹ Purwogandi, B. (2023). *Rekonstruksi regulasi penegakan hukum dalam upaya penanggulangan tindak pidana perbankan yang berkeadilan* (Doctoral dissertation, Universitas Islam Sultan Agung).

¹⁰ UNESA. (2025). *Pemblokiran Rekening oleh PPAATK: Antara Perlindungan dan Polemik Digital*. From: <https://pendidikan-sains.fmipa.unesa.ac.id/post/pemblokiran-rekening-oleh-ppatk-antara-perlindungan-dan-polemik-digital>

The main issue addressed in this research is the conflict between the need for a national oversight system to suppress financial crime and compliance with customer data protection and privacy rights within the national cyber regime. The analysis will also focus on the unequal application of laws, inconsistent notification enforcement, and their impact on public trust in Indonesian digital banking.

Literature studies have shown that various solutions have been attempted, such as optimising the re-verification (KYC) system, digitising notifications (e-notifications), and strengthening dispute resolution procedures. However, these solutions have not fully eroded the public interest or ensured that no customer's rights are diminished due to system negligence.¹¹ Some banks, such as BNI, have begun implementing easier and more transparent balance recovery mechanisms, but nationally, no approach can be called optimal and comprehensive best practice.

Dengan demikian, penelitian ini diharapkan mampu mengatasi keterbatasan dengan mengusulkan model normatif interpretatif berbasis perlindungan hak-hak privasi yang lebih jelas dan berpijak pada prinsip keadilan prosedural serta perlakuan yang sama di depan hukum. Ini termasuk usulan penguatan regulasi yang menyeimbangkan kebutuhan mitigasi kejahatan keuangan dengan penghormatan terhadap data pribadi nasabah.

The expected outcome is the formulation of a progressive legal protection model for dormant account holders in the context of Indonesia's digital financial transformation. This research will not only provide practical benefits in the form of recommendations for legal reform but also theoretically broaden the discourse in the fields of banking law, cyber privacy, and technology-based financial consumer protection. It is also hoped that this study will serve as a reference for digital financial legislative policy solutions that are more responsive to the challenges of the times, while also providing new scientific contributions regarding the urgency of reformulating privacy protection laws amidst the soaring risk of cybercrime in Indonesia. With its integrative model, this research can serve as a foundation for policymakers and banking actors in formulating an account blocking approach that is fair, transparent, and adaptive to the needs of the digital society.

This pandemic perspective can be summarised as this research analyses and contributes to a progressive legal formulation regarding the dual interpretation of privacy and reimagines the role of cyber institutions in realising fair customer protection. Thus, this research plays a role in providing a comprehensive solution to balance financial system protection with respect for the fundamental rights of individuals affected by the dormant account blocking policy in Indonesia.

2. Method

This research uses a normative juridical research method, namely by examining the applicable positive legal norms through a statutory approach.¹² Such as the ITE Law, the Personal Data Protection Law, and banking regulations on account blocking, and supported by a case study approach to analyse relevant legal practices and decisions. The research process begins with identifying and inventorying various laws and regulations related to data privacy and account blocking, then analysing and interpreting the wording of these provisions to understand evolving legal interpretations.¹³

¹¹ Zefanya Aprilia. (2025). *PPATK Blokir Rekening Nganggur atau Dormant, Ini Aturan dari Bank*. From: <https://www.cnbcindonesia.com/market/20250729151218-17-653248/ppatk-blokir-rekening-nganggur-atau-dormant-ini-aturan-dari-bank>

¹² Juliaridi, B., Runtunuwu, Y. B., Musthofa, M. H., TL, A. D., Asriyani, A., Hazmi, R. M., ... & Samara, M. R. (2023). *Metode penelitian hukum*. CV. Gita Lentera.

¹³ Syarif, M., Ramadhani, R., Graha, M. A. W., Yanuarua, T., Muhtar, M. H., Asmah, N., ... & Jannah, M. (2024). *Metode Penelitian Hukum*. Get Press

Furthermore, the research examines several concrete cases in the realm of justice or public news that illustrate the complexities of implementing and enforcing cyber law regarding customer privacy protection in digital banking.¹⁴ By combining normative studies and case analysis, this research is expected to draw a common thread between ideal norms, implementation in the field, and obstacles in reality, so that in the end it can conclude the effectiveness, challenges, and recommendations for improving law in Indonesia regarding privacy protection and banking compliance in the digital era.

3. Analysis or Results

3.1. Implementation of the Dormant Account Blocking Policy: Analysis of Effectiveness, Barriers, and Compliance with Data Privacy Protection

The implementation of the dormant account blocking policy in Indonesia has recently become a major focus in the discourse on financial law and privacy, in line with the increasing prevalence of technology-based financial crimes. This policy arose from the need to maintain financial system stability while fulfilling the prudential mandate stipulated in the Banking Law, Financial Services Authority (OJK) regulations, and the legal framework for Money Laundering (TPPU).¹⁵ By establishing criteria for dormant accounts through integrated supervision between banks and institutions such as the PPATK, it is hoped that preventive efforts can be made to reduce the room for movement of perpetrators of financial crimes.

In practice, blocking dormant accounts faces various procedural and ethical challenges, particularly regarding providing information and notification to customers. Although OJK regulations stipulate the obligation to notify customers before blocking, many account holders report not receiving adequate notification.¹⁶ This discrepancy between written regulations and field practice is what sparked the polemic regarding legal certainty and the principle of fairness in banking services.

The theory of consumer protection law, as put forward by experts such as Gustav Radbruch and Hans Kelsen, emphasises the importance of certainty, justice and benefit in every policy concerning public rights.¹⁷¹⁸ If the blocking procedure creates uncertainty, confusion, or even harms customers without a clear legitimate reason, then the policy deserves a thorough critical evaluation.

It appears that the implementation of blocking dormant accounts is quite effective in suppressing criminal practices such as money laundering, buying and selling fake accounts, and cyber fraud, as shown in the significant decrease in the proportion of illegal transactions based on the PPATK annual report.¹⁹ However, the effectiveness of this crime prevention aspect cannot be separated from other consequences, namely the emergence of anxiety regarding privacy violations and a decrease in people's sense of security in storing funds in banking institutions.

The privacy aspect itself has increasingly come under the spotlight since the enactment

¹⁴ Sampara, S., & Husen, L. O. (2016). *Metode Penelitian Hukum*. Kretakupa Print.

¹⁵ Setiawan, H. (2022). Implementasi Kebijakan Pemblokiran Rekening Dormant dalam Upaya Pencegahan Kejahatan Finansial Digital. *Jurnal Hukum dan Perbankan*, 13(2), 149-162.

¹⁶ Pratama, I.G.S. (2022). Ketidaksiharian Prosedur Pemblokiran Rekening dengan Aturan OJK dan Dampaknya terhadap Hak Nasabah. *Jurnal Cakrawala Hukum*, 13(1), 60-70.

¹⁷ Marzuki, P. M. (2021). Penegakan Hukum Perlindungan Konsumen di Indonesia: Perspektif Nilai Hukum Radbruch dan Hans Kelsen. *Jurnal Ilmu Hukum*, 17(1), 33-47.

¹⁸ Permatasari, M. A. Z. A. I. (2017). Tinjauan Yuridis Terhadap Undang-Undang Nomor 8 Tahun 1999 Tentang Perlindungan Konsumen Berdasarkan Pasal 28 D Ayat (1) Uud Ri 1945 Sebagai Wujud Kepastian Hukum Bagi Konsumen. In *Seminar Nasional "Perlindungan Hukum Terhadap Tenaga Kesehatan dan Pasien dalam Perspektif UU No. 36 Tahun 2014"*. Universitas Islam Batik Surakarta.

¹⁹ PPATK. (2023). *Laporan Tahunan PPATK 2023: Sinergi Menjaga Sistem Keuangan Indonesia*. Jakarta: Pusat Pelaporan dan Analisis Transaksi Keuangan.

of the Personal Data Protection Law²⁰, which requires banks and supervisory institutions to uphold the principles of transparency, fairness, and accountability in managing customer data. Field findings indicate that the blocking notification system, sent via email or text message, still lacks verification and various security measures, leaving it vulnerable to misuse or phishing attacks that could compromise customer data and funds.²¹

The next obstacle arises from inter-agency coordination issues. Although the Financial Transaction Reports and Analysis Centre (PPATK) is responsible for analysing and reporting suspicious transactions, clear governance and mechanisms for reimbursing customers for disproportionate blocking still face numerous technical challenges. Nurhadi's research, for example, highlights that overlapping authority between the Financial Services Authority (OJK), PPATK, and banking operators can delay dispute resolution and undermine public trust in the banking system itself.²²

An ethical dilemma exists between compliance with crime prevention laws and banks' obligations to protect customer loyalty and privacy rights. Referring to Jeremy Bentham's theory of legal utilitarianism, public policy is indeed oriented toward maximising utility. However, applying a purely utilitarian approach often ignores the negative impacts on vulnerable groups, particularly those who still use dormant accounts for vital needs such as education planning or emergencies.²³

Unfortunately, the increasingly widespread digitalisation of banking has not been fully accompanied by improvements in digital identity infrastructure. Know Your Customer (KYC) systems are implemented at the initial account opening stage, but regular data updates are still very limited. As a result, changing customer needs and statuses are not optimally accommodated, leading to accounts belonging to customers with infrequent transactions often being classified as dormant and potentially blocked without thorough verification.²⁴

One emerging idea in the literature is the use of e-notifications through banking apps or digital platforms as a form of process transparency. However, this study found that many customers are still unfamiliar with or lack access to adequate digital devices, making notifications via apps often ineffective. The digital literacy gap also presents a challenging data protection situation for communities in non-urban areas.²⁵

The gaps in public protection for customers impacted by the blockade become increasingly apparent when case observations and complaint mechanisms are analysed. Previous studies tended to highlight the slowness of the complaint resolution process, but recent research has found improvements at several banks, such as providing online dispute resolution channels. However, there is no legal certainty underlying the speed or quality of these dispute resolutions.²⁶

Consistency in the treatment of dormant accounts also remains a major issue, particularly for accounts related to gifts, inheritances, or long-term educational needs. Blocking without considering the context of each case tends to lead to injustice and violate

²⁰ *Vide* Undang-Undang No. 27 Tahun 2022 tentang Pelindungan Data Pribadi

²¹ Yuliana, S., & Prasetyo, D. (2024). Perlindungan Hukum atas Data Pribadi terhadap Kejahatan Siber: Analisis UU No. 27 Tahun 2022 dan Praktik Perbankan Digital. *Parhesia: Jurnal Hukum dan Teknologi*, 6(1), 45–59.

²² Nurhadi, M. (2023). Koordinasi Antar Lembaga dalam Penanganan Sengketa Blokir Rekening Nasabah Perbankan di Era Digital. *Jurnal Hukum & Pembangunan Ekonomi*, 10(1), 92–104.

²³ Sari, A. Y., Prasetyo, D., & Yuliana, S. (2023). Risiko Sosial dan Regulasi Keuangan Digital: Analisis Blokir Rekening Dormant di Indonesia. *Jurnal Ekonomi dan Hukum Digital*, 2(3), 88–105.

²⁴ BNI Annual Report (2024): Embracing Digital Transformation for Inclusive Banking. Jakarta: PT Bank Negara Indonesia (Persero) Tbk. From: <https://www.bni.co.id/id-id/tentangkami/profilperusahaan/annualreport.aspx>

²⁵ Wulandari, I., & Sembiring, A. (2022). Analisis Perlindungan Nasabah atas Pemblokiran Rekening Dormant di Era Digital Banking. *Jurnal Hukum & Bisnis*, 9(1), 55–69.

²⁶ Fathurrochman, I. (2024). Transformasi Resolusi Sengketa Nasabah Perbankan di Era Digital: Peluang dan Tantangan Implementasi Jalur Online. *Jurnal Hukum Kontemporer*, 11(1), 92–110.

the principle of privacy protection under the ITE Law²⁷ and Article 15 of the Consumer Protection Law.²⁸

Another aspect that has been criticised is the internal mechanisms of banks themselves. Expert witnesses in several civil cases acknowledged that the technical administrative guidelines regarding dormant accounts are still far from uniform, leading each bank to interpret them differently in practice. This lack of uniformity creates governance uncertainty and increases the potential for customer rights violations.

External audits revealed the need for improved data security standards and stricter implementation of masking and pseudonymization techniques in the reporting process to the Financial Transaction Reports and Analysis Centre (PPATK). The reality on the ground shows that most banks lack data defence systems capable of containing the risk of data breaches from unauthorised parties, a highly vulnerable situation in an era of rampant cyberattacks.²⁹

The tentative hypothesis of this discussion is that the effectiveness of dormant account blocking policy implementation is significantly influenced by the quality of the communication system, procedural transparency, and the speed and clarity of legal protection provided to affected customers. An effective policy is not merely one that reduces crime statistics but also provides procedural fairness and respects customer rights, as required by the principle of due process of law.

To improve the practice of dormant account blocking in the future, the authors recommend synchronising regulations between institutions and strengthening internal bank controls. The government and regulators are also encouraged to develop a progressive and responsive legal framework, while simultaneously enhancing supervisory capacity with the assistance of technologies such as artificial intelligence, while balancing strict privacy policies and remedial mechanisms for affected customers.

This research's contribution lies in its proposed integration of risk-based policy and rights-based protection approaches, so that banking regulatory reform not only demands administrative compliance but also places equal importance on respecting customers' constitutional rights. This update is relevant considering that academic studies have focused primarily on administrative procedures and fund security without taking into account the complex dynamics of digital privacy and the need for more substantive individual protection.

The establishment of this new paradigm is expected to encourage the implementation of dormant account blocking policies towards a more humane banking legal regime that is responsive to the challenges of Indonesian cyber law, while still maintaining the integrity of the national financial system as mandated by various positive legal norms and global development trends in privacy protection.

3.2. A Case Study of Cyber Law Confusion: Legal Protection for Customers, Dual Interpretations of Privacy, and Implications for Public Trust

Case studies of the cyber legal disputes surrounding the legal protection of banking customers in Indonesia offer a vivid illustration of how overlapping regulations, a lack of uniform procedures, and the development of financial technology are increasingly testing the resilience and relevance of legal norms. For example, numerous civil and criminal lawsuits

²⁷ *Vide* Pasal 26 Undang-Undang Nomor 11 Tahun 2008 tentang Informasi dan Transaksi Elektronik (UU ITE), sebagaimana telah diubah dengan UU No. 19 Tahun 2016

²⁸ *Vide* Pasal 15 Undang-Undang Nomor 8 Tahun 1999 tentang Perlindungan Konsumen

²⁹ Deloitte Indonesia. (2024). Cybersecurity and Data Privacy Outlook: Banking Sector Indonesia 2024. Deloitte Touche Tohmatsu Limited. From: <https://www2.deloitte.com/id/en/pages/risk/articles/indonesia-cybersecurity-data-privacy-2024.html>

related to the blocking of dormant accounts frequently surface. One widely studied example is the unilateral blocking of accounts by banks without adequate notice, which customers then sue in court. Courts themselves are often faced with the dilemma of upholding crime prevention procedures and protecting individual customer rights, particularly in situations where financial losses and loss of access to funds are real.³⁰

Another controversy arises when the blocked account is related to social interests, such as the distribution of social assistance, scholarships, or inheritance funds. In these cases, courts often highlight the fact that blocking mechanisms are often generalised and do not address case-by-case investigations. Customers who feel innocent become victims of automated administrative policies, contradicting the principles of legality and non-discrimination as outlined in Ronald Dworkin's human rights theory.³¹

Amid this debate, multiple interpretations of privacy arise from the tension between protecting the public interest and individual rights to manage personal data. Within the cyber legal framework, Article 26 of the Electronic Information and Transactions Law and the Personal Data Protection Law guarantee the right to privacy as a fundamental right, but in practice, enforcement often leaves gaps, both due to a lack of public awareness among financial service operators and due to legal vacuums in its implementation in the digital realm.

Differences in approach are also evident in the interpretation of a customer's legal standing when suing a bank or supervisory agency for blocking an account. In some cases, courts have emphasised that banks must prove sufficient legal grounds (just cause) when terminating a customer's access to their account. If no clear indication is found, blocking is considered a violation of contract and consumer protection under Article 1365 of the Civil Code and Article 40 of the Banking Law.

Another finding emerged in the analysis of the public controversy, specifically regarding the public's lack of awareness regarding their rights as customers. A recent survey confirmed that many customers do not understand the complaints procedure, their legal standing if affected by a block, and the corrective steps that can be taken. While transparency is a key principle in consumer protection under OJK Regulation No. 1/POJK.07/2013, in practice, it is still often ignored by industry players.³²

The study of responsive legal theory introduced by Philippe Nonet and Philip Selznick underlines the need for law that is able to adapt and respond to the interests of society without losing its just character.³³ In the case of account blocking, this means that regulations and law enforcement officials need to continually update their approach so that they can protect both banks and customers in a balanced and humane manner.

An analysis of court decisions shows a paradigm shift; judges now place greater emphasis on customers' rights to procedural fairness and data protection. However,

³⁰ Pratama, I. G. S. (2024). Perlindungan Hukum Nasabah atas Pemblokiran Sepihak Rekening Perbankan: Studi Kasus Putusan Pengadilan di Indonesia. *Jurnal Cakrawala Hukum*, 15(1), 75–89.

³¹ Möller, K. (2017). Dworkin's Theory of Rights in the Age of Proportionality. Retrieved from London School of Economics: <https://eprints.lse.ac.uk/85642/1/Dworkin's%20Theory%20of%20Rights%20-%20LEHR%20-%20final.pdf>

³² *Vide* Peraturan Otoritas Jasa Keuangan Nomor 1/POJK.07/2013 Tahun 2013 tentang Perlindungan Konsumen Sektor Jasa Keuangan

³³ Nonet, P., & Selznick, P. (2017). *Law and Society in Transition: Toward Responsive Law*. Routledge.

inconsistencies in decisions also frequently occur due to the lack of specific benchmarks for interpreting norms between cyber law, banking law, and consumer protection law.³⁴

Furthermore, public trust in the digital banking industry is seriously under pressure when dispute resolution mechanisms are slow and bureaucratic. Customers affected by blocking often encounter convoluted and administratively inadequate mediation processes, fueling widespread dissatisfaction with the digital financial consumer protection system.

This conflict is further exacerbated by changes in the digital banking landscape, including the introduction of automated verification services and artificial intelligence-based suspicious transaction detection. While these processes improve detection capacity, they also raise issues of fairness and vulnerability to system errors. Customers' data is often managed algorithmically without manual oversight, allowing for large-scale blocking and privacy violations without individual accountability.³⁵

The impact of these cases is not only legal, but also psychological and social. Customers who are victims of automatic blocking often experience material losses, psychological distress, and even a decline in trust in banks and the financial system. However, Niklas Luhmann's theory of social trust emphasises that the sustainability of an institution depends heavily on the level of public confidence in its fairness.

Reflecting on the dynamics of the cases above shows that there remains a normative gap between the need to secure the banking system and the protection of customer rights, particularly the right to information, the right to access, and the right to recover losses resulting from inaccurate or intransparent blocking policies. Existing regulations provide minimal guidance to industry players on how to balance these two major mandates.

Practical studies recommend the establishment of an independent institution or external ombudsman to oversee the dispute resolution process, along with strengthening digital literacy mechanisms for the public to understand the procedures, rights, and remediation efforts in the event of a blocking. Furthermore, strengthening the role of regulators is also crucial in assessing and evaluating bank performance in implementing legal protection based on actual cases.

As a normative response, harmonisation of banking regulations, consumer protection, and cyber law is needed, including revisions to OJK regulations and internal bank standard operating procedures. The Financial Services Authority (OJK) and the Financial Transaction Reports and Analysis Centre (PPATK) are encouraged to immediately develop a joint protocol containing detailed provisions regarding the process, notification, and remedies for account blocking, to prevent multiple interpretations and expedite the restoration of customer rights. In theory and practice, the success of customer legal protection is largely determined by the extent to which financial institutions, regulators, and courts can adopt an adaptive, accountable approach that prioritises substantive justice, rather than solely administrative or narrow doctrinal aspects.

Systemic restructuring of customer legal protection in the cyber era requires openness, a commitment to regulatory change, and cross-sector collaboration to maintain and increase

³⁴ Fathurrochman, I. (2024). Transformasi Resolusi Sengketa Nasabah Perbankan di Era Digital: Peluang dan Tantangan Implementasi Jalur Online. *Jurnal Hukum Kontemporer*, 11(1), 92–110.

³⁵ Deloitte. (2024). *New Deloitte report explores risks of Generative AI use in the Asia Pacific financial services sector*. From: <https://www.deloitte.com/southeast-asia/en/about/press-room/risks-of-generative-ai-use-in-asia-pacific-financial-services-sector.html>

public trust in digital banking in line with technological advances and the needs of today's Indonesian society.

4. Closing

The policy of blocking dormant accounts in Indonesia has serious consequences for the protection of customer privacy rights and the effectiveness of banking regulations in the era of cyber law. Analysis of policy implementation and case studies of legal disputes demonstrates a gap between the need to mitigate financial crime and the protection of individual rights, particularly in the areas of access, privacy, and legal certainty. Therefore, the research objective of uncovering the effectiveness, constraints, and legal impact of this policy on customer position and trust has been achieved through a systematic discussion grounded in relevant theories and legal frameworks, as well as actual empirical findings.

Based on the research findings, practical applications that can be immediately adopted include harmonising standard operating procedures (SOPs) for blocking interbank accounts, strengthening legal protection through certainty of notification, and establishing a dispute resolution mechanism that is easy and adaptable in the digital age. The main recommendation is regulatory reform through collaboration between the Financial Services Authority (OJK), Financial Transaction Reports and Analysis Centre (PPATK), and legislative authorities, aimed at creating a protection system that is responsive to privacy rights and effective in preventing cyber financial crime. By integrating digital literacy and strengthening the role of independent supervisory institutions, it is hoped that digital financial practices in Indonesia can develop inclusively, safely, and continue to prioritise the principles of justice and legal certainty for all parties.

References

Books with an author:

- Juliardi, B., Runtuwuwu, Y. B., Musthofa, M. H., TL, A. D., Asriyani, A., Hazmi, R. M., ... & Samara, M. R. (2023). *Metode penelitian hukum*. CV. Gita Lentera.
- Möller, K. (2017). *Dworkin's Theory of Rights in the Age of Proportionality*. Retrieved from London School of Economics.
- Nonet, P., & Selznick, P. (2017). *Law and Society in Transition: Toward Responsive Law*. Routledge.
- Sampara, S., & Husen, L. O. (2016). *Metode Penelitian Hukum*. Kretakupa Print.
- Syarif, M., Ramadhani, R., Graha, M. A. W., Yanuaria, T., Muhtar, M. H., Asmah, N., ... & Jannah, M. (2024). *Metode Penelitian Hukum*. Get Press

Journal articles:

- Fathurrochman, I. (2024). Transformasi Resolusi Sengketa Nasabah Perbankan di Era Digital: Peluang dan Tantangan Implementasi Jalur Online. *Jurnal Hukum Kontemporer*, 11(1), 92–110.
- Marzuki, P. M. (2021). Penegakan Hukum Perlindungan Konsumen di Indonesia: Perspektif Nilai Hukum Radbruch dan Hans Kelsen. *Jurnal Ilmu Hukum*, 17(1), 33–47.
- Nurhadi, M. (2023). Koordinasi Antar Lembaga dalam Penanganan Sengketa Blokir Rekening Nasabah Perbankan di Era Digital. *Jurnal Hukum & Pembangunan Ekonomi*, 10(1), 92–104.
- Pratama, I. G. S. (2024). Perlindungan Hukum Nasabah atas Pemblokiran Sepihak Rekening Perbankan: Studi Kasus Putusan Pengadilan di Indonesia. *Jurnal Cakrawala Hukum*, 15(1), 75–89.

- Pratama, I.G.S. (2022). Ketidaksesuaian Prosedur Pemblokiran Rekening dengan Aturan OJK dan Dampaknya terhadap Hak Nasabah. *Jurnal Cakrawala Hukum*, 13(1), 60–70.
- Sari, A. Y., Prasetyo, D., & Yuliana, S. (2023). Risiko Sosial dan Regulasi Keuangan Digital: Analisis Blokir Rekening Dormant di Indonesia. *Jurnal Ekonomi dan Hukum Digital*, 2(3), 88–105.
- Setiawan, H. (2022). Implementasi Kebijakan Pemblokiran Rekening Dormant dalam Upaya Pencegahan Kejahatan Finansial Digital. *Jurnal Hukum dan Perbankan*, 13(2), 149-162.
- Wulandari, I., & Sembiring, A. (2022). Analisis Perlindungan Nasabah atas Pemblokiran Rekening Dormant di Era Digital Banking. *Jurnal Hukum & Bisnis*, 9(1), 55–69.
- Yuliana, S., & Prasetyo, D. (2024). Perlindungan Hukum atas Data Pribadi terhadap Kejahatan Siber: Analisis UU No. 27 Tahun 2022 dan Praktik Perbankan Digital. *Parhesia: Jurnal Hukum dan Teknologi*, 6(1), 45–59.

Others:

- BNI Annual Report (2024): Embracing Digital Transformation for Inclusive Banking.
- Buana, H. (2023). Tanggung Jawab Bank dalam Pelanggaran Prinsip Kehati-hatian pada Pemblokiran Rekening Nasabah Salah Sasaran (Doctoral dissertation, Universitas Islam Indonesia).
- Permatasari, M. A. Z. A. I. (2017). Tinjauan Yuridis Terhadap Undang-Undang Nomor 8 Tahun 1999 Tentang Perlindungan Konsumen Berdasarkan Pasal 28 D Ayat (1) Uud Ri 1945 Sebagai Wujud Kepastian Hukum Bagi Konsumen. In Seminar Nasional "Perlindungan Hukum Terhadap Tenaga Kesehatan dan Pasien dalam Perspektif UU No. 36 Tahun 2014". Universitas Islam Batik Surakarta.
- PPATK. (2023). Laporan Tahunan PPATK 2023: Sinergi Menjaga Sistem Keuangan Indonesia. Jakarta: Pusat Pelaporan dan Analisis Transaksi Keuangan.
- Purwogandi, B. (2023). Rekonstruksi regulasi penegakan hukum dalam upaya penanggulangan tindak pidana perbankan yang berkeadilan (Doctoral dissertation, Universitas Islam Sultan Agung).

World Wide Web:

- CNN Indonesia. (2025). Pengertian Rekening Dormant yang Terancam Kena Blokir PPATK. From: <https://www.cnnindonesia.com/ekonomi/20250730105429-78-1256605/pengertian-rekening-dormant-yang-terancam-kena-blokir-ppatk>.
- Deloitte Indonesia. (2024). Cybersecurity and Data Privacy Outlook: Banking Sector Indonesia 2024. Deloitte Touche Tohmatsu Limited. From: <https://www2.deloitte.com/id/en/pages/risk/articles/indonesia-cybersecurity-data-privacy-2024.html>
- Deloitte. (2024). New Deloitte report explores risks of Generative AI use in the Asia Pacific financial services sector. From: <https://www.deloitte.com/southeast-asia/en/about/press-room/risks-of-generative-ai-use-in-asia-pacific-financial-services-sector.html>
- Gibran Maulana Ibrahim, (2025). Soal Pemblokiran Rekening Dormant, PPATK Bicara Lindungi Hak Nasabah. From: <https://news.detik.com/berita/d-8037905/soal-pemblokiran-rekening-dormant-ppatk-bicara-lindungi-hak-nasabah>.
- Jakarta: PT Bank Negara Indonesia (Persero) Tbk. From: <https://www.bni.co.id/id-id/tentangkami/profilperusahaan/annualreport.aspx>
- PPATK. (2025). PPATK Hentikan Sementara Transaksi Rekening Dormant Untuk Lindungi Kepentingan Publik. From: https://www.ppatk.go.id/siaran_pers/read/1476/ppatk-hentikan-sementara-transaksi-rekening-dormant-untuk-lindungi-kepentingan-publik.html

