

## VICTIMOLOGY AND LAW ENFORCEMENT IN ONLINE LOAN JOCKEY SCAMS

Antony<sup>1\*</sup>, John Elvin Louis<sup>2</sup>

<sup>1</sup>Faculty of Law, International Batam University, Indonesia

<sup>2</sup>Faculty of Law, Youngsan University, South Korea

\*Correspondence: [antony@uib.ac.id](mailto:antony@uib.ac.id)

**Citation:** Antony, and John Elvin Louis. 2026. "Victimology and Law Enforcement in Online Loan Jockey Scams". *Walisongo Law Review (Walrev)* 8 (1):1-26. <https://doi.org/10.21580/walrev.2026.8.1.27587>.

Copyright (c) 2026 by Authors

This work is licensed under a Creative Commons Attribution-ShareAlike 4.0 International License.



**Abstract:** The proliferation of offers from perpetrators providing “loan jockey” services exploit the anxiety experienced by online lending borrowers who have defaulted, with the intent of trapping them. This study aims to analyze the relationship between victims and perpetrators, particularly unscrupulous providers of such services, and to propose law enforcement strategies and victim protection measures from a victimological perspective. This research employs a normative juridical (doctrinal) method, utilizing both statutory and conceptual approaches. The findings indicate a close and reciprocal relationship of victimization between perpetrators and victims. Users of “loan jockey” services often not only contribute to the occurrence of criminal acts against themselves but may also accelerate such acts. Efforts to combat the increasing prevalence of these perpetrators through criminal law policy alone are insufficient. Alternative strategies are necessary, including the fulfilment of victims’ rights and obligations through a victimological approach. This approach is expected to enhance legal awareness and foster a sense of responsibility among potential and actual victims to remain vigilant and protect themselves. The study contributes theoretically by developing a digital victimology framework based on the interactive relationship between victims and perpetrators. Practically, it offers victim protection strategies focused on improving legal literacy and risk awareness in the digital space. Ultimately, this research expands the scope of victimology in addressing the evolving nature of crime in the digital era.

*Maraknya penawaran dari pelaku penyedia jasa joki pinjol memanfaatkan kecemasan yang dialami oleh nasabah pinjol yang telah gagal bayar dengan harapan agar masuk kedalam perangkapnya. Tujuan penelitian ini adalah untuk menganalisis hubungan antara korban dan pelaku yakni oknum penyedia jasa joki pinjol serta menggagas strategi penegakan hukum dan perlindungan korban perspektif ilmu viktimologi. Metode penelitian*

yang digunakan adalah metode yuridis normatif doktrinal dengan pendekatan peraturan perundang-undangan dan pendekatan konseptual. Hasil penelitian ini menunjukkan bahwa adanya hubungan erat terkait viktimasi yang bersifat timbal balik antara pihak pelaku yakni penyedia jasa joki pinjol maupun pihak korban. Korban dari pengguna jasa joki pinjol seringkali tidak hanya menciptakan terjadinya tindak pidana terhadap dirinya sendiri namun juga mempercepatnya. Sejatinya, pemberantasan terhadap pelaku penyedia jasa joki pinjol yang sedang marak terjadi dengan melalui kebijakan hukum pidana bukan merupakan satu-satunya cara namun juga dapat dilakukan dengan strategi lainnya seperti pemenuhan hak dan kewajiban korban melalui pendekatan ilmu viktimologi kepada calon korban/korban yang diharapkan menumbuhkan pengetahuan hukum serta rasa kewajiban untuk selalu waspada dan melindungi diri. Penelitian ini berkontribusi secara teoritis melalui pengembangan kerangka viktimologi digital berbasis relasi interaktif korban dan pelaku. Selain itu, secara praktis penelitian ini menawarkan strategi perlindungan korban yang berfokus pada peningkatan literasi hukum dan kesadaran risiko di ruang digital. Dengan demikian, penelitian ini memperluas kajian viktimologi dalam menghadapi perkembangan kejahatan di era digital.

**Keywords:** Online Loan Jockeys; Victims; Victimology.

## INTRODUCTION

It contains the advancement of financial technology is like a double-edged sword, which on the one hand makes it easier for people to get loans quickly, but on the other hand it increases the consumptive lifestyle as evidenced by the statement from the Financial Services Authority (OJK) that there has been a drastic increase in the distribution of online loan funds to the public, which has reached 20 trillion since August 2022 to date. The increasing distribution of funds is also accompanied by a high number of defaults (Sugangga dan Sentoso 2020). This has prompted OJK and the Indonesian Fintech Association to conduct strict supervision and assessment of the debt repayment ability of prospective fund recipients (Simanjuntak 2023). In terms of funding, based on the Circular Letter of the Financial Services Authority Number 19/SEOJK.06/2023 concerning the Implementation of Information Technology-Based Joint Funding Services, it states that the organizer as a funder must ensure that prospective fund recipients are not currently receiving funding from more than three online loans organizers/platforms.

If in the eligibility assessment stage the prospective funding recipient is found to have received funding from more than three online loan jockey organizers/platforms, the application from the prospective funding recipient must be rejected (Tanri 2023). This strict supervision step has also led to an equally crucial side effect, namely the emergence of loan shark service offers on social media (Mauludiah 2023). The majority of online loans

jockey services are used by people who can no longer apply for loans because they have reached the maximum loan limit/have overdue debt payment obligations that have not been paid off (Hamirul, Sari, dan Jesika 2023). Unscrupulous online loans jockey service providers take advantage of anxiety with the intention of finding an opportunity in narrowness against consumers who already have a track record of defaulting on previous online loans debt payments. This has led to a worrying situation, namely the practice of “Robbing Peter To Pay Paul” (Disemadi 2021).

In practice of “Robbing Peter To Pay Paul” has the meaning the debtor borrows money from one creditor to repay the money borrowed from another creditor that has matured so that the debt has multiplied (Marwan dan Ashghor 2021). The expectations of users of online loans jockey services are to get offers of debt settlement assistance at low costs, but in reality it leads to criminal acts such as extortion, threatening, fraud and misuse of personal data (Hanifawati 2021). Therefore, the urgency of eradicating unscrupulous online loans jockey service providers that are currently rampant must be carried out immediately through strict law enforcement and realizing victim protection through the implementation of a victimology approach to potential victims/victims which is expected to give birth to effective and efficient repressive and preventive protection (Putri dan Rinaldi 2023a) . The use of a victimology approach is also included to minimize the incidence of victims by analyzing in depth the relationship between victims and perpetrators and revealing factors that encourage individuals to be vulnerable to becoming victims.

A number of previous studies have examined the practice of online loan jockey services from various perspectives. For instance, by Hamirul et al., 2023 demonstrates that the provision of such services to borrowers experiencing default tends to exacerbate their financial distress, leading to a “debt cycle” phenomenon. However, this study remains largely descriptive and does not further explore the legal construction of such practices, particularly regarding the legal liability of service providers as principal actors. In addition, the study by Mauludiah, 2023 associates the practice of online loan jockey services with the invalidity of agreements under Article 1320 of the Indonesian Civil Code and examines it from the perspective of Islamic law. Nevertheless, its approach is primarily limited to a normative-doctrinal analysis and does not sufficiently address the practical implementation of legal protection for victims, particularly in the context of weak supervision and law enforcement concerning personal data misuse in the fintech sector. Furthermore, Arvante, 2022 identifies the emergence of criminal acts such as violence, extortion, intimidation, and other human rights violations within online lending practices. However, this study remains general in nature and does not specifically analyze the role and position of online loan jockey service providers as actors contributing to such legal violations.

Therefore, these prior studies have not employed victimology as the primary analytical framework. As a result, victims tend to be positioned merely as passive parties

without further elaboration on victim typologies, levels of vulnerability, and specific legal protection needs. In the context of technology-based crimes such as online loan jockey services, a victimological approach is essential to formulate legal policies that are not only repressive but also oriented toward victim protection. Based on these limitations, this study offers a distinct contribution by specifically examining law enforcement mechanisms against online loan jockey service providers within the Fintech Peer-to-Peer (P2P) Lending ecosystem, while positioning victims as the central focus through a victimological perspective. Accordingly, this research not only fills the existing research gap but also contributes to the development of a more responsive legal protection model against personal data misuse in the digital environment. Based on the aforementioned issues, this study addresses two main research questions: (1) How is the legal framework governing law enforcement against online loan jockey service providers in Indonesia? and (2) How can victim protection for users of online loan jockey services in Indonesia be conceptualized from a victimological perspective?

## RESEARCH METHOD

This research employs a qualitative design using a normative juridical (doctrinal) method, which is elaborated through a statute approach and a conceptual approach (Tan 2021). The statute approach is carried out by analyzing various laws and regulations relevant to the legal issues studied. These include the 1945 Constitution, Law No. 23 of 1847 concerning Civil Law (*Burgerlijk Wetboek*), Law No. 1 of 1946 concerning Criminal Law Regulations, Law No. 1 of 2023 concerning the Criminal Code, Law No. 8 of 1999 concerning Consumer Protection, Law No. 19 of 2016 amending Law No. 11 of 2008 concerning Electronic Information and Transactions, Law No. 27 of 2022 concerning Personal Data Protection, POJK No. 77/POJK.01/2016 concerning Information Technology-Based Lending and Borrowing Services, Bank Indonesia Regulation No. 19/12/PBI/2017 concerning the Implementation of Financial Technology, Minister of Communication and Information Regulation No. 20 of 2016 concerning Protection of Personal Data in Electronic Systems, Circular Letter of the Financial Services Authority No. 19/SEOJK.06/2023 concerning the Implementation of Information Technology-Based Joint Funding Services, and Supreme Court Regulation No. 1 of 2022 concerning Procedures for Settlement of Requests and Notification of Restitution and Compensation to Victims of Crime.

A conceptual approach is employed to formulate legal ideas in areas where legal norms are absent or insufficiently regulated. This approach is grounded in established legal principles and doctrines (Nurisman dan Antony 2023). The data used in this study consist of secondary data derived from primary legal materials (both authoritative and persuasive), secondary legal materials, and tertiary legal materials. These data are collected through library research and subsequently analyzed qualitatively using qualitative content analysis and doctrinal legal analysis (Disemadi 2022).. This study adopts a deductive reasoning

method, drawing conclusions from general principles to address specific legal issues. The conceptual framework is based on Stephen Schafer's victimology theory, which emphasizes the interactive relationship between victims and offenders, as well as victim typologies based on the degree of contribution to the victimization process (Rasiwan 2024). This theoretical framework is particularly relevant for analyzing online loan jockey services, which demonstrate reciprocal interactions within the digital environment. Methodologically, the research is conducted through several stages: (1) identification and classification of legal materials; (2) normative analysis; (3) interpretation and assessment of the conformity between legal norms and victimological theory; and (4) systematic conclusion drawing. These stages underscore the integration between normative legal analysis and the victimological framework in formulating a comprehensive legal protection model.

## **RESULT AND DISCUSSION**

### **Law Enforcement Regulation of Online Loan Jockeys**

People who have low incomes make online loans to get funds instantly, which has led to the high usage of online loans, directly proportional to the high default rate (Jaelani et al. 2022). Therefore, the government presents the BI Checking system / Financial Information Service System (SLIK) which functions to assess the ability to fulfill obligations by prospective fund recipients (Tobing 2023). The BI Checking/SLIK system will provide an assessment status to prospective fund recipients according to their history and abilities which are divided into five collectibilities namely Col-1 (Current), Col-2 (Under Special Attention), Col-3 (Less Current), Col-4 (Doubtful), Col-5 (Bad Debt) (Setiawati 2023).

The collectibility status of the debtor is one of the main determinants of the acceptance of a loan application. If the prospective fund recipient is still in Col-1 (Current), the loan application will be approved, while with a history of fund recipients who are in Col-2 (Under Special Attention), there is a possibility that the loan application will be approved / rejected. If the debtor's history has reached Col-3 (Substandard) to Col-5 (Bad Debt), the loan application will automatically be rejected by the organizer (Baity, Supriyanto, dan Nugraheni 2021) In addition, based on the Circular Letter of the Financial Services Authority Number 19/SEOJK.06/2023 concerning the Implementation of Information Technology-Based Joint Funding Services, if it is found that the prospective fund recipient has received funding from more than three online loans organizers/platforms, the application for a loan application must be rejected.

With the strict supervision of online loans transaction activities by OJK, it has led to the proliferation of online loans jockey services on several social media (Firdaus 2023). The perpetrator as a online loans jockey service provider offers loans instantly and in large nominal amounts while only using victim data accompanied by a mutual agreement. To convince victims, unscrupulous online loans jockey service providers also include screenshot evidence containing success in disbursing other victims funds and persuade

potential victims with very attractive promos. Aggressively, potential victims who are in need of funds will be led into a trap in the hope of overcoming financial problems without thinking about the adverse risks (Sedayu 2023) Offering online loans jockey services seems to be a savior for victims who are having financial problems, but it actually brings bigger problems (Anon 2023).

Victims who use online loans jockey services will submit personal data, which can be in the form of Identity Cards (KTP), Family Cards (KK) to other important data to unscrupulous online loans service providers as a condition for applying for loans. Because victims who use online loans jockey services already have a history of defaulting on several online loans platforms, unscrupulous online loans jockey service providers will apply for loans at illegal online loans using the victim's data (Binekasri 2023). If the funds submitted have been successfully disbursed, the unscrupulous online loans service provider asks the victim for an administration fee in accordance with the initial agreement (Hidayat, Azizah, dan Ridwan 2022). Problems regarding loans that have been submitted using the services of online loans jockey providers are entirely the responsibility of the victim. Like “falling down the stairs”, victims who already have financial problems are increasingly in debt, accompanied by the disappearance of the perpetrator and added to the vulnerability of criminal acts against victims by the perpetrator.

The offer of online loans jockey services from irresponsible individuals is clearly very detrimental to victims who have had anxiety over previous financial problems (Disemadi dan Regent 2021). This is what then becomes a concern and encourages the state to provide legal protection to victims of irresponsible online loans jockey service providers and leads to legal harm such as:

### **1. Unlawful Acts**

The unscrupulous jockey online loans service provider is qualified as a form of unlawful act because it has fulfilled the elements, namely that there is an act containing an offer of a promise to help/find a way out for victims who already have anxiety over financial problems, but in fact the unscrupulous online loans jockey service provider applies for a loan using consumer data on an illegal platform which causes greater material and immaterial losses to consumers in the future (Sinaga dan Alhakim 2022) Based on Article 1365 of the Civil Code, it reads “Every unlawful act that brings harm to another person, obliges the person who causes the loss due to his fault to compensate for the loss”(Bing Waluyo 2022).

In the book “Acts Against the Law”, Rosa Agustina states that an act can be qualified as an act against the law, if it meets the following conditions: 1) Contrary to the perpetrator's legal obligations; 2) Contrary to the subjective rights of others; 3) Contrary to decency; 4) Contrary to compliance, accuracy and prudence (Rosa 2003). Meanwhile, according to Mariam Darus Badruzaman in her book “Civil Code Book III Law of Obligation”, describes the elements in tort actions, namely: 1) There must be an act, either positive as doing or negative as not doing; 2) The act must be against the law; 3) Loss arises;

4) There is a causal relationship between the unlawful act and the loss; and 5) There is fault (Badruzaman 2023).

Legally, the agreement between the victim and the online loans jockey service provider is based on Article 1313 of the Civil Code which reads that “An agreement is an act by which one person/more binds himself to one other person/more”. According to Subekti, obligations born from laws relating to human actions can be divided into lawful obligations and unlawful obligations, namely illegal acts (Suwandono 2023).

The offer offered by unscrupulous online loans jockey service providers to consumers turns into an unlawful engagement (PMH) caused by: 1) Involving illegal activities, unscrupulous online loans jockey service providers apply for loans on illegal online loans sites using victim data; 2) Involving unethical practices, unscrupulous online loans jockey service providers violate norms in society, namely seeking opportunities in other people's distress by labeling offers of help; 3) Contrary to public order and morality, the offers of unscrupulous loan shark service providers actually make victims more indebted and injure the value of morality (Robianti 2018).

## 2. Extortion

Extortion is the act of taking as much benefit as possible from others by threatening (Pradipta, Budyatmojo, dan Setiyanto 2020). In general, the criminal offense of extortion is contained in Law Number 1 of 1946 concerning Criminal Law Regulations and Law Number 1 of 2023 concerning the Criminal Code, as follows: Act No. 1 Year 1946 on Criminal Law Regulation (Currently in effect)

COMPARISON	
Act No. 1 Year 1946 on Criminal Law Regulation (Currently in effect)	Act No. 1 Year 2023 on the Criminal Code (Effective in 2026)
Chapter XXIII on Extortion and Threats as set out in Article 368 (Syamila, Lie, dan Syailendra 2023)	Chapter XXV on the Crime of Extortion and Threatening as set out in Article 482 (Nanang 2023)
(1) Any person who, with intent to unlawfully benefit himself or another, forces someone by force or threat of force to deliver property which wholly or partially belongs to him or to another person, or to make a debt or to cancel a debt, shall, being guilty of extortion, be punished by a maximum imprisonment of 9 (nine) years. (2) The provisions of Article 365 paragraphs (2), (3) and (4) shall apply to this crime.	(1) Punishable for extortion by a maximum imprisonment of 9 (nine) years, any person who with intent to unlawfully benefit himself or another, forces by force or threat of force to: (A) To give any property, which partly or wholly belongs to that person or to another; or (B) To give a debt, to make an acknowledgment of debt, or to cancel a debt. (2) The provisions referred to in Article 479 paragraphs (2) to (4) shall also apply to extortion as referred to in paragraph (1).

**Source:** Primary Law

The elements of the offense contained in the crime of extortion, consist of: a) With the intent to benefit oneself/others; b) Unlawfully; c) Forcing a person by force/threat of

force; d) To give something, either wholly/partially belonging to that person/others/in order to create debt/delete receivables (Kusno, Arifin, dan Mulawarman 2022). Therefore, in transactions between victims and unscrupulous online loans jockey service providers, extortion often occurs which includes various forms such as coercion of unreasonable payments for services that have been provided to victims, intimidating victims with clear additional costs, extortion accompanied by threats to force victims to fulfill certain requirements and if they are not met, unscrupulous online loans jockey service providers will misuse the personal data of victims who have used online loans jockey services (Jalil, Renggong, dan Almusawir 2023).

### 3. Threatening

Threatening is expressing the intent (*mens rea/intention*) to do something that harms, complicates, troubles/harms the other party for personal gain (Andrian 2022). In general, the crime of threatening is stipulated in Law Number 1/1946 on Criminal Law Regulation and Law Number 1/2023 on the Criminal Code, as follows:

COMPARISON	
Law Number 1 Year 1946 on Criminal Law Regulation (Currently in effect)	Law No. 1 of 2023 on the Criminal Code (Effective in 2026)
Chapter XXIII on Extortion and threatening as set out in Article 369 (WN 2022)	Chapter XXV on the Crime of Extortion and Threatening as set out in Article 483 (Sriwulan 2023)
(1) Any person who, with intent to unlawfully benefit himself or another, by threat of verbal or written abuse, or by threat of disclosure, forces someone to give something which wholly or partially belongs to him or to another person, or to make a debt or to annul a debt, shall, being guilty of threats, be punished by a maximum imprisonment of four years.	(1) Shall be punished for threatening with a maximum imprisonment of 4 (four) years or a maximum fine of category IV (IDR 200 million), any person who with intent to unlawfully benefit himself or another, by threat of defamation or libel or by threat of disclosure, forces a person to: (A) To give any property, which partly or wholly belongs to that person or to another; or (B) To give a debt, to make an acknowledgment of debt, or to cancel a debt.

**Source:** Primary Law

The elements of the offense in the article of threatening, consist of: a) With the intent to benefit oneself/others; b) To coerce others c) By threats of verbal or written defamation/threats to reveal secrets; d) to give something, either wholly/partially belonging to that person/others/to create debts/delete receivables (Wahyuni dan Marwenny 2020). The unscrupulous online loans jockey service provider commits a criminal act of threatening the victim which includes various forms such as terminating the service/terminating the account if the victim does not meet the demands of the

perpetrator, unlawfully disseminating the victim's personal data, threatening by impersonating the authorities to frighten the victim to carry out terror.

#### 4. Fraud

According to R. Soesilo, the crime of fraud consists of (Nazilah 2022): 1) To induce a person to give goods, to incur debts or to cancel receivables; 2) The purpose of the inducement is to benefit oneself/another person against the right; 3) The inducement is by using a false name/false circumstances, clever tricks, trickery/a series of lies. The elements of the offense in the article of fraud are: a) a person's actions by deception; b) a series of lies; c) false names and false conditions; d) the intention to benefit oneself without rights (Hadiyanto et al. 2023).

In general, the crime of threatening is stipulated in Law Number 1/1946 on Criminal Law Regulation and Law Number 1/2023 on the Criminal Code, as follows:

COMPARISON	
Law Number 1 Year 1946 on Criminal Law Regulation (Currently in effect)	Law No. 1 of 2023 on the Criminal Code (Effective in 2026)
Chapter XXV on Fraud as set out in Article 378 (Rahmad 2019)	Chapter XXVII on the Crime of Fraudulent Acts as set out in Article 492 (Nurlail 2023)
(1) Any person who, with intent to unlawfully benefit himself or another, by means of a false name or false dignity, deceit or a series of falsehoods, induces another person to deliver any property to him, or to give a debt or to annul a debt, shall, being guilty of fraud, be punished by a maximum imprisonment of 4 (four) years.	(1) Any person who with intent to unlawfully benefit himself or another by using a false name or false position, by deceit or a series of false words, induces a person to deliver a good, to give a debt, to make an acknowledgment of debt, or to cancel a debt, shall be punished for fraud, by a maximum imprisonment of 4 (four) years or a maximum fine of category V (500 million).

**Source:** Primary Law

The material act of the crime of fraud is to persuade someone in any way to deliver goods, make debts / write off receivables. limitingly the effort used by the perpetrator that causes the fraud to be punishable such as using a false name/position, misuse of religion, deception to a series of false words (Hasibuan, Panjaitan, dan Sativa 2023). The unscrupulous online loans jockey service provider will offer assistance in applying for online loans with low interest/tempting promos to attract potential victims (a series of lies) which ends in criminal fraud.

#### 5. Cyber Extortion

Extortion with threats through the internet media is in principle the same as extortion with conventional threats, but the difference is the means used by the perpetrator, namely through the internet media so that the victim's personal data becomes an object that is empowered as a means of threatening including electronic

information/electronic documents (Susanti, Parman, dan Ufran 2023). Acts of extortion/threats committed in cyberspace are contained in regulations:

---

**Law No.19 of 2016 concerning Amendments to Law No. 11 of 2008 concerning Electronic Information and Transactions (UU ITE)**

---

Chapter VII on Prohibited Acts as stipulated in Article 27 paragraph (4) (Salsabila, Dewi, dan Wulandari 2023)

---

- (1) Every person intentionally and without right distributes and/or transmits and/or makes accessible electronic information and/or electronic documents that contain extortion and/or threats.

The criminal punishment in Article 27 paragraph (4) of the ITE Law is regulated in Article 45 paragraph (4) of Law No. 19 of 2016 concerning Amendments to Law No. 11 of 2008 concerning Electronic Information and Transactions (ITE Law), namely imprisonment for a maximum of 6 years and/or a maximum fine of Rp 1 billion.

---

**Source:** Primary Law

The unscrupulous online loans jockey service providers who have obtained consumer personal data will commit criminal acts of extortion against victims through electronic media which will directly torture the victim's psychology by providing treatment such as humiliating the victim, spreading photos to spreading false information to the victim's closest people.

## 6. Misuse of Personal Data

The form of personal data protection in implementing online loans lies on both sides, namely the online loans jockey service provider as the controller of the victim's personal data which is obliged to obtain prior approval from the owner of personal data legally when carrying out the process of borrowing funds on the online loans platform as agreed upon and desired by the victim in accordance with the law, and vice versa, data owners who have an obligation to always be vigilant and not carelessly provide personal data to others (Vaddhano 2023). In reality, there are still unscrupulous online loans service providers who use victim data for personal gain or victims who are negligent in maintaining personal data so that they end up harming themselves (Nurani, Wiryanto, dan Riyanto 2023). The misuse of personal data by irresponsible individuals clearly violates several provisions of the law, among others:

Legislation related to the act of misuse of consumer personal data by unscrupulous loan sharking service providers

Regulation	Explanation
Article 28 G paragraph (1) of the 1945 Constitution of the Republic of Indonesia	Stating that "Everyone has the right to protection of self, family, honor, dignity and property under his control, and is entitled to a sense of security and protection from threats of fear to do / not do something that is a human right", this article means that the guarantee of the right to privacy / personal data of each person is very important and closely related to a sense of security (Saleh et al. 2023): As a result of the misuse of the victim's personal data by the perpetrator, namely the irresponsible

---

	online loans jockey service provider, it creates an obligation for the state to re-create a sense of security and protection of personal data for every Indonesian citizen (Hidayah dan Marsitinarsih 2020).
Republic of Indonesia Regulation of the Minister of Communication and Information No. 20/2016 on the Protection of Personal Data in Electronic Systems	Stating that personal data is certain individual data that is stored, maintained, kept true to protect its confidentiality (Mutiarra dan Maulana 2020). Personal data protection regulations are legal products created to protect and as a basis/guideline for managing personal data, namely from acquisition, collection, analysis, storage, opening access and destruction (Samin 2024). Personal data protection is also one of the key strategies in increasing Indonesian investment and creating a conducive environment, especially in managing consumer data (Nugroho et al. 2022). In fact, based on Article 26 of Ministerial Regulation No. 20 of 2016, the owner of personal data has the right to confidentiality of his/her data, has the right to file a complaint in the context of resolving personal data disputes, has the right to file a complaint in the context of resolving personal data disputes, has the right to obtain access to obtain personal data history and has the right to request the destruction of certain individual data belonging to him/her in the electronic system (Kurniawati dan Yunanto 2022). As a result of the misuse of personal data by the perpetrators, namely irresponsible online loan jockey service providers, it has injured the values of justice, expediency and certainty to the dignity, honor and integrity of the community as victims.
Law No. 27 of 2022 on Personal Data Protection	In Chapter XIII of the PDP Law on Prohibition in the Use of Personal Data as stipulated in Article 65 paragraph (3) which states that "Every person is prohibited from unlawfully using personal data that does not belong to him" (Muzakkie dan Eka Juarsa 2023). Based on this article, the act of disseminating and misusing the victim's personal data by the perpetrator, namely the unscrupulous online loans jockey service provider, has legally violated the provisions of the PDP Law, causing the victim to be depressed and suffer material and non-material losses. The PDP Law is a special legal product to protect victims of data dissemination and misuse to obtain justice accompanied by punishment for the perpetrators (Dianti dan Nugroho 2023). Provisions for punishment of perpetrators of the dissemination and use of personal data are regulated in Article 67 paragraph (3) with a maximum imprisonment of 5 years and a maximum fine of Rp 5,000,000,000 (five billion rupiah).

---

**Source:** Primary Law

Indonesia as a state of law places the law as the commander in chief to realize the three values of legal objectives, namely justice, benefit and certainty. Even in the concept of a state of law, it is obliged to uphold the principle of equality, namely *similia similibus*/the principle of equality before the law, which means that in achieving true

justice, it is not allowed to privilege/discriminate against certain groups and groups (Waliden, Maulida, dan Rachmatulloh 2022). Therefore, the state must be present to protect and guarantee the rights of victims who have fallen into the trap of the perpetrators, namely unscrupulous loan shark service providers. The rampant use of personal data by unscrupulous loan shark service providers is very concerning and causes losses that are not only material but also immaterial such as damage to one's reputation / good name, causing psychological pressure and indirectly stating the failure of the state to protect the middle and lower classes (Sunarto et al. 2023). Strict and strict law enforcement against criminal acts of misuse of personal data by online loans jockey service providers is one of the right strategies / steps as a form of protection of self-esteem, honor and also the integrity of society based on humanity and is a human right mandated directly in the constitution of the Republic of Indonesia.

As part of strengthening the analysis, the study of law enforcement against online loan jockey service providers should not be confined solely to positive legal norms, but must also be developed through a victimological perspective, particularly concerning the legal relationship between offenders and victims. Accordingly, the effectiveness of existing regulations needs to be evaluated in practice (law in action) by examining enforcement constraints, institutional limitations, and the limited number of judicial decisions addressing online loan jockey service providers. This condition reflects a gap between law in books and its practical implementation, which results in suboptimal protection for victims, particularly in cases involving the misuse of personal data (Wahdah dan Triadi 2025). Therefore, the analysis of statutory regulations should be complemented by critical and contextual interpretation in order to contribute to the formulation of a more effective, responsive, and victim-oriented law enforcement framework.

### **Victimological Protection for Online Loan Jockey Users in Indonesia**

People who use online loans jockey services have a much greater vulnerability and risk in suffering both material and immaterial losses arising from irresponsible actions by the perpetrators, namely unscrupulous online loans jockey service providers. Therefore, the party who suffers both material and immaterial losses is called the victim (Bambang Waluyo 2022). Based on the perspective of victimology, victims generally have a variety of typologies that aim to explain the victimization process that occurs in victims. Victimization has the understanding that the process to the results of what actions cause/encourage a person to become a victim, so that the concept of victim typology in victimology can be a measure of the degree of victim guilt and the perspective of responsibility by the victim, especially the rampant misuse of data by unscrupulous loan shark service providers in Indonesia today (Ekawati 2023).

According to Stephen Schafer, in principle there are 4 (four) types of victims, namely people who have nothing wrong but become victims, victims who consciously/unconsciously have done something that stimulates others to commit crimes,

victims who are biologically and socially potential to become victims, and victims themselves are perpetrators (Maulana, Halim, dan Wijaya 2023). Based on Stephen Schafer's thoughts related to victim typology, it can illustrate that in the occurrence of a crime, the blame does not necessarily lie entirely with the perpetrator alone. In his theory of criminal-function relationship, Stephen Schafer explains the relationship between the victim and the perpetrator of the crime as well as the responsibility of the victim himself (Putri dan Rinaldi 2023b). Regarding the rampant use of victims personal data by loan sharking service providers in Indonesia, there is a relationship between the perpetrators and victims when examined with the theory of criminal function relationships, among others:

An Examination of the Relationship Between Victims and the Rampant Use of Personal Data by Unscrupulous Lending Service Providers from the Perspective of Victim Typology

Qualification	Explanation
Unrelated Victims	There is no responsibility from the victim for the crime of misuse of personal data by unscrupulous online loans service providers, the victim is an unlucky individual who is the target of the perpetrator of the crime (Hermawanti et al. 2022). There is no relationship between the perpetrator and the victim except when the perpetrator has committed the crime against the victim. According to Stephen Schafer, all people have the potential to become victims. Therefore, based on the theory of unrelated victims, full responsibility lies with the perpetrator, namely the unscrupulous online loans service provider who misused personal data against the victim.
Provocative Victims	Victimshares responsibility, occurring in situations where the victim actively encourages victimization and the harm caused by the crime may be used by the victim to gain a greater advantage (Golose 2023). Based on the theory of provocative victims, victims as a result of the use of personal data by unscrupulous online loans jockey service providers want and encourage the use of personal data because victims provide personal data to agree to the use of their personal data to be used as a tool in applying for online loans on various platforms without thinking about the risks that will arise in the future.
Precipitative Victims	Victims who are to a certain extent responsible, namely victims who unconsciously leave themselves open to being victims by placing themselves in places, times and conditions that can be harmed both materially and immaterially (Bravita 2023). Based on the theory of precipitative victims, victims of personal data misuse by unscrupulous online loans jockey service providers submit personal/open data to irresponsible perpetrators so that criminal acts arise that bring unexpected losses without thinking about the risks that will arise in the future.

Social Weak Victims	Victims are a part of society that is not considered by the wider community as a member of that society, so there is a vulnerability to being targeted by criminals (Sumarna 2023). Based on the theory of social weak victims, the victims of the use of personal data by unscrupulous online loans jockey service providers have a weak social economic position and are not considered by the surrounding community so that victims choose the last resort, namely using online loans jockey services in the hope of getting funds without thinking about the risks that will arise in the future.
Self-Victimizing Victims	Victimization occurs as a result of a crime committed by oneself, so the responsibility lies with the victim (Mardiyanto 2023). Examples of this theory, such as individuals who use drugs, prostitution, gambling and other activities where victims and criminal acts are related to each other. Based on the theory of self-victimizing victims, victims as consumers who use online loans jockey services have previously had debt payment obligations on several platforms caused by consumptive lifestyles and unhealthy lifestyles such as gambling addiction, drug addiction and other harmful activities so that they really need funds quickly without thinking about the risks that will be caused in the future.

**Source:** Author Analysis, 2025

Based on the theories of victim typology put forward by Stephen Schafer, if it is related to the relationship between the victim and the perpetrator of personal data abuse, namely the unscrupulous loan shark service provider, it is found that in casuistic cases the victim not only creates the criminal act of using his own personal data but also accelerates it. With the intention that the victim can develop the direction of the perpetrator's criminal act against himself either consciously/unconsciously, negligence to ignorance of the law, ignoring the risks taken and perhaps the victim feels that his provocation is justified. The perspective of victim typology theory in the science of victimology reveals that victims of personal data misuse by unscrupulous loan shark service providers can be passively involved in shaping, motivating and facilitating the realization of a criminal act (Sartika dan Larasati 2023).

Meanwhile, according to Separovic, there are several factors that cause victims, namely personal factors, social factors and situational factors (Sunarso 2012). Personal factors include biological conditions such as age, gender, mental state and psychological conditions such as aggressiveness, recklessness and isolation. Social factors such as being a minority group, living environment to interpersonal relationships that influence each other. And situational factors that are influenced by certain situations that are complicated to a certain place and time. In terms of personal factors, victims who use online loans jockey services already have mental health problems such as having high levels of anxiety to have short thinking/psychological disorders so that they cannot think clearly about the actions taken (Rosadi dan Andriani 2023). Therefore, a high level of vulnerability to the

misuse of victims personal data by unscrupulous online loans jockey service providers is very likely to occur.

While social factors, victims who have been in debt / overdue debt payment obligations tend to be shunned by the wider community because victims will ask for help from the surrounding community which will only be considered burdensome, therefore victims who are full of anxiety over debt payment obligations will choose the last resort, namely using the services of online loans as the only one without thinking about the risks that will occur in the future, namely the occurrence of criminal acts of extortion, threatening, and misuse of personal data by unscrupulous online loans jockey service providers (Rahman 2023). And situational factors, where victims who have had previous debts have felt down, endless fear, anxiety, confusion, worry until the motivation arises to use the services of online loans jockeys because they get tempting offers and hopes both through recommendations from others and advertisements that appear on social media platforms (Rohmi et al. 2024).

Based on Seporavic's statement, the factor in the emergence of victims of personal data misuse by unscrupulous online loans jockey service providers occurs to victims who have a low level of financial literacy and do not have the initiative to seek information regarding the legality of the loan application service. Victims let it happen because they think there is no big risk as a consequence of this omission. Financial constraints make victims only focus on loans without caring about the legality of the online loans place that victims apply for (Nuraini 2024). Therefore, based on Law Number 31 of 2014 concerning amendments to Law Number 13 of 2006 concerning Witness and Victim Protection that every victim has the right to obtain protection, support, and assistance and this is also part of the protection of human rights (Nur, Sirjon, dan Sulihin 2023).

Victims are not only understood as objects of a criminal act but must also be understood as subjects who need to be given legal and social protection. As for realizing the reflection of the rule of law, the state is obliged to provide legal protection to every victim caused by the criminal act of threatening, bullying, fraud to the use of personal data by unscrupulous online loans jockey service providers which can be done with preventive and repressive efforts (Arrasuli dan Fahmi 2023). Preventive efforts to prevent victims of personal data misuse by unscrupulous online loans jockey service providers can be done in several ways such as: 1) Conducting socialization to the public regarding the procedures for using financial technology and healthy and good financial management; 2) Providing education to the public so that they are not easily tempted by tempting offers of loan shark services; 3) Appealing to the importance of protecting their own personal data; 4) Encouraging cooperation between the government, supervisory institutions and other financial institutions to effectively identify and suppress the movement of loan shark service providers; and 5) Encouraging the use of data security technologies such as data encryption and dual security authentication systems to protect users' personal data from unauthorized access;

Preventive legal protection strategies are in line with the aims and objectives of the science of victimology, which is to provide confidence that every victim has the right and obligation to know about a danger that will be faced in relation to every behavior in everyday life (Mutmainnah 2022). The strengthening, especially in the field of counseling, coaching, and socialization, serves to prevent the emergence of structural/non-structural victims. The purpose of the science of victimology is not to frighten, but to provide good understanding and vigilance to potential victims/victims of the perpetrator's crime, seeking security/safe life of a person includes the widest possible knowledge of how to deal with a danger and especially how to avoid the traps of the perpetrator of a criminal offense (Ramagusba 2023). The form of preventive protection is a strategy carried out to prevent victims from being victimized by unscrupulous online loans jockey service providers who are currently rampant on social media.

In addition to preventive protection, there is repressive protection which is a form of protection given to legal subjects who have become victims of a criminal offense. The form of repressive legal protection can be in the form of protection of victims' rights contained in several laws and regulations such as:

Regulations on Repressive Legal Protection of Victims by Offenders namely  
Online Loans Jockey Service Providers

Qualification	Explanation
Law No. 31 of 2014 on the Amendment to Law No.13 of 2006 on Witness and Victim Protection	<p>After incurring both material and immaterial losses, victims of criminal acts have rights based on Law No. 31 of 2014 concerning Witness and Victim Protection, namely (Putri dan Ammi 2021):</p> <ul style="list-style-type: none"> <li>○ Article 5 letter A, states that victims have the right to protection of personal, family and property security and freedom from all threats related to the testimony they will, are or have given;</li> <li>○ Article 5 letter N, states the right to receive legal advice;</li> <li>○ Article 7 letter A, states that victims of criminal offense are entitled to restitution in the form of compensation for loss of wealth/income, compensation arising from suffering directly related to the criminal offense, reimbursement of medical/psychological treatment costs.</li> </ul>
Government Regulation No. 7/2018 on Providing Compensation, Restitution and Assistance to Victim Witnesses	<p>In implementing the provisions of the Law on Witness and Victim Protection, Government Regulation No. 44/2008 on the Provision of Compensation, Restitution and Assistance to Witnesses and Victims has been enacted (Erwin, Ornella, dan Desmon 2023). Compensation is compensation provided by the state because the perpetrator is unable to provide the full compensation for which he is responsible to the victim/family (Nurfadilah, Diab, dan Djaoe 2023). The procedure for obtaining compensation can be submitted in writing in Indonesian on sufficient stamped paper to the court through the Witness and Victim Protection Agency (LPSK).</p>

---

Supreme Court  
Regulation No.1  
Year 2022.

The development of the criminal justice system is not only oriented towards the interests of the perpetrators, but also towards the protection of victims, so that every victim of certain criminal acts in addition to getting the right to protection also has the right to restitution and compensation (Sadiawati, Dirkareshza, dan Fauzan 2023). Supreme Court Regulation No. 1 of 2022 regulates the procedure for resolving applications and providing restitution and compensation to victims of criminal acts.

---

**Source:** Author Analysis, 2025

Apart from the above regulations, repressive legal protection for victims can be carried out in ways such as: 1) Creating a reporting mechanism that is easily accessible for every victim; 2) Increase stricter supervision in eradicating unscrupulous online loans jockey service providers, especially in social media to prevent criminal acts of threatening, extortion, fraud and misuse of victims' personal data; 3) Reconstruction of law enforcement in investigating and following up on cases of criminal acts committed by unscrupulous loan shark service providers effectively and efficiently; 4) Providing the rights of victims of criminal acts committed by unscrupulous loan shark service providers (Muzakkie dan Eka Juarsa 2023).

Although the rights of victims have been adequately provided in the form of the right to financial assistance, the right to medical/psychological services and legal assistance, it does not mean that the obligations of victims of a criminal offense are ignored because victims also have roles and obligations that are expected to significantly reduce crime. For this reason, there are several general obligations of crime victims, including: 1) The obligation not to take vigilante action against the perpetrator (retaliation); 2) The obligation to prevent the possibility of recurrence of criminal acts; 3) The obligation to provide adequate information regarding the occurrence of crime to the authorities; 4) The obligation not to make excessive demands on the perpetrator; 5) The obligation to become a witness to a crime that has befallen him/her, as long as it does not endanger him/her and his/her family; 6) The obligation to assist various interested parties in crime prevention efforts; and 7) The obligation to be willing to be coached to avoid becoming a victim again (Rakinaung 2023).

Based on the analysis of the science of victimology, the relationship between the victim and the perpetrator of the online loans jockey service provider is interrelated and it is found that sometimes/probably the victim not only creates the criminal act of using his own personal data but also accelerates it. With the intention that the victim can develop the direction of the perpetrator's criminal act against himself either consciously/unconsciously, negligence to ignorance of the law, ignoring the risks taken and maybe the victim feels that his provocation is justified (Situmeang 2021). The rampant use of personal data by unscrupulous loan shark service providers has caused many casualties accompanied by huge losses, therefore the resolution of criminal acts committed by the perpetrators, namely unscrupulous loan shark service providers, needs to be resolved

immediately by imposing sanctions on the perpetrators firmly and carrying out repressive and preventive protection to potential victims and victims. The most important thing is to increase the awareness of potential victims and victims so that they are not easily tempted/trapped by the perpetrators of online loans jockey service providers.

Based on this research, it encourages the state to pay special attention and be present in the community as a protector of the rights of victims of the perpetrator's criminal acts and can create justice, certainty and expediency in a society in need (Niffari 2020). The availability of regulations that ensnare the perpetrators to strengthen repressive and preventive legal protection for victims is expected to be an effective and efficient strategy in suppressing the high number of criminal acts by the perpetrators, namely unscrupulous online loans jockey service providers in Indonesia and vice versa, namely potential victims/victims can increase their own awareness, especially in increasing personal financial literacy, maintaining their own personal data properly to carry out their obligations to foster themselves so as not to become victims/try not to position themselves as victims of a criminal act either consciously or unconsciously. Nevertheless, the current victim protection system continues to face several shortcomings, including the suboptimal mechanisms for victim recovery, limited access to restitution and rehabilitation, and the lack of integrated cross-sectoral mechanisms in addressing cases of personal data misuse. Therefore, from a modern victimological perspective, a victim-centered approach is required, positioning victims as the primary subjects of protection. This can be achieved through strengthening compensation and restitution mechanisms, optimizing the role of victim protection institutions, and developing sustainable prevention systems based on digital and financial literacy, in order to establish a more accurate, effective, and equitable legal protection framework.

## CONCLUSION

From a victimological perspective, this study finds that the emergence of victims in the practice of online loan jockey services is not solely caused by the actions of offenders, but is also influenced by the level of victim vulnerability, such as low financial literacy and negligence in safeguarding personal data. These factors may accelerate the occurrence of criminal acts, whether consciously or unconsciously. This finding indicates that the victim-offender relationship in financial technology-based crimes is complex and cannot be understood in a simplistic manner; rather, it requires a victimological approach that positions victims as subjects with distinct characteristics, varying levels of vulnerability, and specific protection needs. From a theoretical standpoint, this study underscores the importance of strengthening the victimological approach in fintech law studies, particularly through a shift from an offender-oriented approach toward a victim-centered approach. This shift is essential to ensure that the legal system functions not only as a repressive instrument through the enforcement of positive law—as stipulated in the 1945 Constitution of the Republic of Indonesia, the Civil Code, the Criminal Code, the

Electronic Information and Transactions Law, and the Personal Data Protection Law, but also as a mechanism capable of providing effective protection for victims, both preventively and rehabilitatively.

From a policy perspective, concrete measures are required to enhance the effectiveness of victim protection and law enforcement against offenders. The Financial Services Authority (OJK) should strengthen its supervision of fintech P2P lending providers and expand financial literacy programs for the public. Meanwhile, the Ministry of Communication and Information Technology (Kominfo) is expected to intensify oversight of personal data misuse in the digital sphere and accelerate enforcement actions against illegal platforms. Law enforcement authorities, in general, need to optimize enforcement efforts against online loan jockey service providers by adopting not only a repressive but also a victim-responsive approach. In addition, the Witness and Victim Protection Agency (LPSK) should broaden access to protection mechanisms, including restitution, compensation, and rehabilitation for victims of personal data misuse. Accordingly, inter-agency collaboration, coupled with the strengthening of a victimological approach, is expected to establish a more effective, equitable, and socially beneficial legal protection system in the digital era. [W]

## BIBLIOGRAPHY

- Andrian, Kiki. 2022. "Penegakan Hukum Terhadap Pelaku Tindak Pidana Pengancaman Dengan Kekerasan Melalui Media Sosial." *Jurnal Justisia: Jurnal Ilmu Hukum, Perundang-undangan dan Pranata Sosial* 7(1):268. <https://doi.org/10.22373/justisia.v7i1.13220>.
- Anon. 2023. "OJK Wanti-wanti Soal Modus Joki Pinjol, Data Pribadi Bisa Tersebar." *CNN Indonesia*. Diambil 1 Januari 2024 (<https://www.cnnindonesia.com/ekonomi/20231030195143-78-1017877/ojk-wanti-wanti-soal-modus-joki-pinjol-data-pribadi-bisa-tersebar>).
- Arrasuli, Beni Kharisma, dan Khairul Fahmi. 2023. "Perlindungan Hukum Positif Indonesia Terhadap Kejahatan Penyalagunaan Data Pribadi." *UNES Journal of Swara Justisia* 7(2):369. <https://doi.org/10.31933/ujsi.v7i2.351>.
- Arvante, Jeremy Zefanya Yaka. 2022. "Dampak Permasalahan Pinjaman Online dan Perlindungan Hukum Bagi Konsumen Pinjaman Online." *Ikatan Penulis Mahasiswa Hukum Indonesia Law Journal* 2(1):73-87. <https://doi.org/10.15294/ipmhi.v2i1.53736>.
- Badruzaman, Mariam Darus. 2023. *Hukum Perikatan dalam KUH Perdata Buku Ketiga Yurisprudensi, Doktrin Serta Penjelasan*. diedit oleh Ajuk. Yogyakarta: Deepublish Digital.

- Baity, Riesha Mawarni, Trisiladi Supriyanto, dan Siwi Nugraheni. 2021. "Implementasi Restrukturisasi Murabahah di Masa Pandemi Covid-19 pada Bank BJB Syariah KCP Bogor." *Etihad: Journal of Islamic Banking and Finance* 1(2):132-45. <https://doi.org/10.21154/etihad.v1i2.3246>.
- Binekasri, Romys. 2023. "Hati-hati Modus Joki Pinjol, Bikin Kredit Macet Makin Numpuk." *CNBC INDONESIA*. Diambil 1 Januari 2024 (<https://www.cnbcindonesia.com/market/20231030115057-17-484763/hati-hati-modus-joki-pinjol-bikin-kredit-macet-makin-numpuk>).
- Bravita, Muhamad Faathir Justiano. 2023. "Pemberian Ganti Rugi Terhadap Korban Tindak Pidana Penipuan Afiliator Binary Option Perspektif Hukum Positif dan Hukum Islam." *Universitas Islam Indonesia*. <https://dspace.uui.ac.id/handle/123456789/44452>
- Dianti, Swanasti Djatu, dan Andriyanto Adhi Nugroho. 2023. "Perlindungan Hukum Konsumen Pengguna Aplikasi E-Commerce Terhadap Kasus Penyalahgunaan Akun dalam Konstruksi Hukum ITE." *Al Qalam: Jurnal Ilmiah Keagamaan dan Kemasyarakatan* 17(2):232. <https://doi.org/10.35931/aq.v17i2.1978>.
- Disemadi, Hari Sutra. 2021. "Legal Aspects of 'Gali Lubang Tutup Lubang' in Fintech P2P Lending Business During Covid-19." *Talrev* 6(1):237-51. <https://doi.org/10.31843/jmbi.v6i1.187.2>.
- Disemadi, Hari Sutra. 2022. "Lenses of Legal Research: A Descriptive Essay on Legal Research Methodologies." *Journal of Judicial Review* 24(2):289. doi: 10.37253/jjr.v24i2.7280.
- Disemadi, Hari Sutra, dan Regent Regent. 2021. "Urgensi Suatu Regulasi yang Komprehensif Tentang Fintech Berbasis Pinjaman Online Sebagai Upaya Perlindungan Konsumen di Indonesia." *Jurnal Komunikasi Hukum (JKH)* 7(2):605-18. <https://doi.org/10.23887/jkh.v7i2.37991>.
- Ekawati, Ekawati. 2023. "Peranan Korban Kejahatan Sebagai Pertimbangan Hakim Dalam Penjatuhan Putusan Pembedanaan." *Universitas Hasanuddin*. [https://repository.unhas.ac.id/id/eprint/26994/1/B011191169\\_skrpsi\\_03-04-2023%20bab%201-3.pdf](https://repository.unhas.ac.id/id/eprint/26994/1/B011191169_skrpsi_03-04-2023%20bab%201-3.pdf)
- Erwin, Rahmi, Rina Angelia Rahma Ornella, dan Andi Desmon. 2023. "Pemberian Restitusi Dan Kompensasi Korban Tindak Pidana Dalam Sistem Peradilan Di Indonesia." *Ensiklopedia of Journal* 5(2):1-8. <https://doi.org/10.33559/eoj.v5i2.1510>
- Firdaus, Raditya. 2023. "Mapping Tweet Terhadap Fitur Paylater Menggunakan Cluster Analysis." *Universitas Andalas*. <http://scholar.unand.ac.id/210881/>

- Golose, Petrus Reinhard. 2023. "a Legal Analysis of Crime Victim Protection in Indonesia." *Russian Law Journal* 11(3s):402-9. <https://doi.org/10.52783/rlj.v11i3s.786>.
- Hadiyanto, Alwan, Mas Subagyo Eko Prasetyo, Sumarwoto, Esti Royani, Yasmirah Mandasari Saragih, Herwin Sulistyowati, dan Haris Budiman. 2023. *Tindak Pidana Penipuan Menurut KUHP Dan Syariat Islam*. diedit oleh T. Artanto. Jakarta: Damera Press.
- Hamirul, Hamirul, Mela Sari, dan Silvia Jesika. 2023. *Joki Pinjol Membuat Sudah Jatuh Tertimpa Tangga*. Mojokerto: CV. instight Mediatama.
- Hanifawati, Saida Dita. 2021. "Urgensi Penegakan Hukum Pidana pada Penerima Pinjaman Kegiatan Peer To Peer Lending Fintech Ilegal dan Perlindungan Data Pribadi." *Jurnal Penegakan Hukum dan Keadilan* 2(2):162-72. <https://doi.org/10.18196/jphk.v2i2.12181>.
- Hasibuan, Nahda, Budi Sastra Panjaitan, dan Annisa Sativa. 2023. "Tinjauan Hukum Pidana Islam terhadap Tindak Pidana Penipuan." *Hukum dan Demokrasi (HD)* 23(1):1-19. <https://doi.org/10.61234/hd.v23i1.11>.
- Hermawanti, Kori, Intan Nuraini Sopiyan, Hanifah Zakiyatun Nufus, dan Kuswandi Kuswandi. 2022. "Perlindungan Hukum Terhadap Investor pada Investasi Ilegal Secara Online dalam Perspektif Viktimologi." *Ajudikasi: Jurnal Ilmu Hukum* 6(2):233-48. <https://doi.org/10.30656/ajudikasi.v6i2.4687>.
- Hidayah, Ardhiana, dan Marsitiningasih Marsitiningasih. 2020. "Aspek Hukum Perlindungan Data Konsumen E-Commerce." *Kosmik Hukum* 20(1):56. <https://doi.org/10.30595/kosmikhukum.v20i1.8251>.
- Hidayat, Agung, Nur Azizah, dan Muannif Ridwan. 2022. "Pinjaman Online dan Keabsahannya Menurut Hukum Perjanjian Islam." *Jurnal Indragiri Penelitian Multidisiplin* 2(1):1-9. <https://doi.org/10.58707/jipm.v2i1.115>.
- Jaelani, Elan, Muhamad Kholid, Utang Rosidin, dan Ransya Ayu Zulvia. 2022. "Penyelesaian Sengketa Jika Terjadi Wanprestasi Dalam Pinjaman Online." *Transparansi Hukum* 5(2):1-14. <https://doi.org/10.30737/transparansi.v5i2.4345>.
- Jalil, Tasya Ramadani, Ruslan Renggong, dan Almusawir Almusawir. 2023. "Tindak Pidana Pemasaran Melalui Aplikasi Pinjaman Online Ilegal." *Clavia: Journal Of Law* 21(1):152-59. <https://doi.org/10.56326/clavia.v21i1.2277>.
- Kurniawati, Husni, dan Yunanto Yunanto. 2022. "Perlindungan Hukum Terhadap Penyalahgunaan Data Pribadi Debitur Dalam Aktivitas Pinjaman Online." *Jurnal*

*Ius Constituendum* 7(1):102-14. <https://doi.org/10.26623/jic.v7i1.4290>

- Kusno, Ali, M. Bahri Arifin, dan Widyatmike Gede Mulawarman. 2022. "Pengungkapan Pemerasan dan Pengancaman pada Alat Bukti Kasus Pinjaman Online (Kajian Linguistik Forensik)." *Diglosia: Jurnal Kajian Bahasa, Sastra, dan Pengajarannya* 5(3):555-70. <https://doi.org/10.30872/diglosia.v5i3.423>.
- Mardiyanto, Ibnu. 2023. "Tinjauan Viktimologi Terhadap Kejahatan Bunuh Diri (Victimless Crime)." *Jurnal Hukum Non Diskriminatif* 1(2):51-58. doi: 10.56854/jhdn.v1i2.137.
- Marwan, Awaludin, dan Aly Ashghor. 2021. "Gali Lubang Tutup Lubang di Tengah Pandemi: Teknologi Finansial dalam Perspektif Hukum dan Teori Keamanan." *Jurnal Keamanan Nasional* 6(2):219-34. <https://doi.org/10.31599/jkn.v6i2.480>.
- Maulana, Aby, Pathorang Halim, dan Tubagus Heru Dharma Wijaya. 2023. "Kebijakan Penyelesaian Perkara Pidana di Luar Pengadilan Dengan Model Pemaafan Korban (Victim Pardon Model) dalam Pembaruan Hukum Pidana Nasional (Perspektif Hukum Pidana dan Hukum Islam)." *Al-Qisth Law Review* 7(1):132. <https://doi.org/10.24853/al-qisth.7.1.132-166>.
- Mauludiah, Ayuna Nur Habibatul. 2023. "Analisis Transaksi Pinjaman Online Melalui Jasa Joki Pinjaman Online Perspektif Hukum Positif Dan Hukum Islam: Studi Pada Akun Instagram @Jokigalbaypinjol\_Id." Universitas Islam Negeri Maulana Malik Ibrahim Malang.
- Mutiara, Upik, dan Romi Maulana. 2020. "Perlindungan Data Pribadi Sebagai Bagian Dari Hak Asasi Manusia Atas Perlindungan Diri Pribadi." *Indonesian Journal of Law and Policy Studies* 1(1):42. <https://doi.org/10.31000/ijlp.v1i1.2648>.
- Mutmainnah, Ayu Mughni. 2022. "Tinjauan Viktimologis Kejahatan Penyebaran Data Pribadi (Peer To Peer Lending) Oleh Pinjaman Online Ilegal" di Kota Makassar." Universitas Hasanuddin.
- Muzakkie, Shohiban Azkaa, dan Eka Juarsa. 2023. "Perlindungan Hukum Terhadap Penyalahgunaan Data Pribadi Pada Aplikasi Pinjaman Online Ilegal Menurut Undang-Undang No 27 Tahun 2022 Tentang Perlindungan Data Pribadi." *Bandung Conference Series: Law Studies* 3(2):984-87. <https://doi.org/10.29313/bcsls.v3i2.7284>.
- Nanang, Hidayat. 2023. "Proses Penyelesaian Perkara Tindak Pidana Melalui Restorative Justice." Universitas Muhammadiyah Metro.
- Nazilah, Iftiarini Rahmatun. 2022. "Pengembalian Kerugian Sebagai Alasan Meringankan Hukuman Dalam Tindak Pidana Penipuan Perspektif Hukum Islam (Studi Kasus

- Putusan No.76/Pid.Sus/2021/PN Pwt).” Universitas Islam Negeri (UIN).
- Niffari, Hanifan. 2020. “Perlindungan Data Pribadi Sebagai Bagian Dari Hak Asasi Manusia Atas Perlindungan Diri Pribadi (Suatu Tinjauan Komparatif Dengan Peraturan Perundang-Undangan Di Negara Lain).” *Jurnal Hukum dan Bisnis (Selisik)* 6(1):1-14. <https://doi.org/10.35814/selisik.v6i1.1699>.
- Nugroho, R. Satriyo, M. Iswahyudi Maulana, Gian Stanggi Devega Cupu, Aneke Rintiasti, Aan Anto S, dan Deny Suryana. 2022. “Industrial Revolution 4.0 Towards Industrial Metaverse.” *Prosiding Seminar Nasional BSKJI “Post Pandemic Economy Recovery”* VI:12-21.
- Nur, Fuad, Lade Sirjon, dan La Ode Muhamad Sulihin. 2023. “Akses Keadilan Bagi Korban Tindak Pidana Dalam Perspektif Hak Asasi Manusia.” *Innovative: Journal Of Social Science Research* 3(5):7588-7603. <https://doi.org/10.31004/innovative.v3i5.5818>.
- Nuraini, Indah. 2024. “Pengaruh Pengertahuan, Gaya Hidup Dan Religiusitas Mahasiswa FEB Universitas Jambi Terhadap Keputusan Penggunaan Fintech (Pinjaman Online) Dalam Perspektif Ekonomi Islam.” Universitas Jambi.
- Nurani, Evi, Wiryanto Wiryanto, dan Slamet Riyanto. 2023. “Optimalisasi Perlindungan Konsumen Atas Kebocoran Pengelolaan Data Pribadi Dalam Pinjaman Online.” *JURISDICTIE* 5(2):51-69. <https://doi.org/10.34005/jhj.v5i2.133>.
- Nurfadilah, Nurfadilah, Ashadi L. Diab, dan Andi Novita Mudriani Djaoe. 2023. “Perlindungan Hukum Terhadap Korban Penyalagunaan Data Pribadi Pada Aplikasi Pinjaman Online.” *FAWAID: Sharia Economic Law Review* 4(2). <https://doi.org/10.31332/flr.v4i2.4424>.
- Nurisman, Eko, dan Antony Antony. 2023. “Unmasking Xenophobia: Exploring Anti-Chinese Sentiments in Indonesia through a Criminological Lens.” *Journal of Judicial Review* 25(1):89. <https://doi.org/10.37253/jjr.v25i1.7731>.
- Nurlail, Annisa. 2023. “Pengembalian Kerugian bagi Korban Tindak Pidana Penipuan.” *National Conference on Law Studies (NCOLS)*. 5(1):454-88.
- Pradipta, Rezky Bagas, Winarno Budyatmojo, dan Budi Setiyanto. 2020. “Menelaah Asas Lex Specialis Derogat Legi Generali Pada Tindak Pidana Pemerasan Dan Pengancaman Melalui Sistem Elektronik (Studi Putusan Pengadilan Negeri Pandang Panjang Nomor 15/Pid.B/2015/PN. PDP).” *Recidive: Jurnal Hukum Pidana dan Penanggulangan Kejahatan* 9(3):238. <https://doi.org/10.20961/recidive.v9i3.47415>.
- Putri, Kristiani Virgi Kusuma, dan Nuril Ammi. 2021. “E-Protection : Sistem Perlindungan

Saksi dan Korban Teror Cybercrime dalam Upaya Penegakan Hukum di Indonesia.” *Universitas Brawijaya*.

- Putri, Poppy Amanda, dan Kasmanto Rinaldi. 2023a. *Pinjaman Online Ilegal: Suatu Analisis Viktimologi (Studi di Teluk Kuantan Kabupaten Kuantan Singingi)*. diedit oleh R. Kusumawati. Sumedang: CV. Mega Press Nusantara.
- Putri, Poppy Amanda, dan Kasmanto Rinaldi. 2023b. “The problems of Illegal Online Loans based on the Victim’s Perspective: A Case Study.” *International Journal of Advances in Social and Economics* 4(3):102–6. <https://doi.org/10.33122/ijase.v4i3.215>.
- Rahmad, Noor. 2019. “Kajian Hukum terhadap Tindak Pidana Penipuan Secara Online.” *Jurnal Hukum Ekonomi Syariah (J-HES)* 3(2):1–15.
- Rahman, Mizan Ikhlusal. 2023. “Livelihood Adaptation And Well-Being In A Slum.” *Dinamika Ekonomi: Jurnal Ekonomi Dan Bisnis* 16(1):1–17. <https://doi.org/10.53651/jdeb.v16i1.418>.
- Rakinaung, Veronica Nasrani. 2023. “Perlindungan Hukum Terhadap Korban Desk Collector Financial Technology Ilegal Serta Pertanggungjawaban Pidana Bagi Pelaku.” *Lex Administratum* 11(2):1–16.
- Ramagusba, Arman. 2023. “Tinjauan Viktimologis Terhadap Kejahatan Pinjaman Online Ilegal = A Victimological Review Of Illegal Online Loan Crime.” Universitas Hasanuddin.
- Rasiwan, H. Iwan. 2024. *Suatu Pengantar Viktimologi*. diedit oleh M. Renganis. DKI Jakarta: PT Indonesia Delapan Kreasi Nusa.
- Robianti, Masayu. 2018. “Analisis Hukum Perjanjian Kontrak Yang Berujung Pada Perbuatan Melawan Hukum.” *Justicia Sains: Jurnal Ilmu Hukum* 3(1). <https://doi.org/10.24967/jcs.v3i1.347>.
- Rohmi, Misfi Laili, Nur Syamsiyah, Lilis Renfiana, dan Carmidah Carmidah. 2024. “Pelatihan Literasi Keuangan: Cermat Meminjam dan Menabung.” *JPMI: Jurnal Pengabdian Masyarakat* 3(1):217–29. <https://doi.org/10.55606/jpmi.v3i1.3457>.
- Rosa, Agustina. 2003. *Perbuatan Melawan Hukum*. Jakarta: Pasca Sarjana Universitas Indonesia.
- Rosadi, Delfira Syelfiyola, dan Inge Andriani. 2023. “Hubungan Impulsive Buying dengan Perilaku Berhutang pada Pengguna Pinjaman Online.” *JIMPS: Jurnal Ilmiah Mahasiswa Pendidikan Sejarah* 8(4):3655–64. <https://doi.org/10.24815/jimps.v8i4.26214>.

- Sadiawati, Diani, Rianda Dirkareshza, dan Muhammad Fauzan. 2023. "Rekonstruksi Perlindungan Hukum Terhadap Korban Investasi Bodong: Studi Komparasi Indonesia dan Amerika." *Halu Oleo Law Review* 7(2):149-66. <https://doi.org/10.33561/holrev.v7i2.25>.
- Saleh, H. Moh., Khairus Febryan Fitrahady, Ahmad Zuhairi, Budi Sutrisno, dan Putri Annisya Chaerani. 2023. "Penyuluhan Tentang Penanganan Penyalagunaan Data Pribadi Terhadap Nasabah Peer To Peer Lending Berdasarkan Hukum Positif Di Kecamatan Gunung Sari." *Prosiding PEPADU 2023* 5:1-7.
- Salsabila, Dinda, Sinta Dewi, dan Widati Wulandari. 2023. "Tindakan Doxing Di Media Sosial Berdasarkan Undang-Undang Nomor 19 Tahun 2016 Tentang Perubahan Atas Undang-Undang Nomor 11 Tahun 2008 Tentang Informasi Dan Transaksi Elektronik Dikaitkan Dengan Konsep Perlindungan Privasi." *Qiyas : Jurnal Hukum Islam dan Peradilan* 8(1). <https://doi.org/10.29300/qys.v8i1.10332>.
- Samin, Herol Hansen. 2024. "Perlindungan Hukum Terhadap Kebocoran Data Pribadi Oleh Pengendali Data Melalui Pendekatan Hukum Progresif." *Jurnal Ilmiah Research Student* 1(3):1-14. <https://doi.org/10.61722/jirs.v1i3.386>.
- Sartika, Kartika Dwi, dan Dewi Larasati. 2023. "Literature Review: Dampak Fenomena Pinjaman Online Ilegal di Indonesia." *Innovative: Journal Of Social Science Research* 3(6):2940-2948. <https://doi.org/10.31004/innovative.v3i6.6517>.
- Sedayu, Agung. 2023. "Hati-hati Joki Pinjol, Modus dan Bahayanya." *Tempo.co*.
- Setiawati, Susi. 2023. "BI Checking: KOL-5 Bikin Susah Dapat Kerja, Kok Bisa?" *CNBC INDONESIA*. Diambil 1 Januari 2024 (<https://www.cnbcindonesia.com/research/20230823090450-128-465308/bi-checking-kol-5-bikin-susah-dapat-kerja-kok-bisa>).
- Simanjuntak, Jimmy. 2023. "Penggunaan Informasi Debitor Dari Sistem Layanan Informasi Keuangan Otoritas Jasa Keuangan (SLIK OJK) Sebagai Alat Bukti Permohonan PKPU." *Jurnal Hukum to-ra : Hukum Untuk Mengatur dan Melindungi Masyarakat* 9(1):73-84. <https://doi.org/10.55809/tora.v9i1.209>.
- Sinaga, Eko Pratama, dan Abdurrahman Alhakim. 2022. "Tinjauan Yuridis Terhadap Perlindungan Hukum Bagi Pengguna Jasa Pinjaman Online Ilegal Di Indonesia." *UNES Law Review* 4(3):283-96. <https://doi.org/10.31933/unesrev.v4i3.235>.
- Situmeang, Sahat Maruli Tua. 2021. "Penyalagunaan Data Pribadi Sebagai Bentuk Kejahatan Sempurna Dalam Perspektif Hukum Siber." *SASI* 27(1):38. <https://doi.org/10.47268/sasi.v27i1.394>.
- Sriwulan. 2023. "Tinjauan Yuridis Tindak Pidana Cyber Crime Di Indonesia." Institut

Agama Islam Negeri Palopo.

- Sugangga, Rayyan, dan Erwin Hari Sentoso. 2020. "Perlindungan Hukum Terhadap Pengguna Pinjaman Online (PINJOL) Ilegal." *Pakuan Justice Journal Of Law* 1(1):47-61. <https://doi.org/10.33751/pajoul.v1i1.2050>.
- Sumarna, Alex. 2023. "Rekonstruksi Regulasi Upaya Ganti Kerugian Korban Dalam Penegakan Hukum Pidana Berbasis Nilai Keadilan." Universitas Islam Sultan Agung.
- Sunarso, Siswanto. 2012. *Viktimologi Dalam Sistem Peradilan Pidana*. diedit oleh Tarmizi dan Suryani. Jakarta: Sinar Grafika.
- Sunarto, Atika, Inson Putra Natal, Muhammad Ali Adnan, dan Tajuddin Noor. 2023. "Perlindungan Konsumen Dalam Industri 'Peer To Peer Lending' Di Indonesia." *Jurnal Darma Agung* 31(4):876-87. <https://doi.org/10.46930/ojsuda.v31i4.3558>.
- Susanti, Endri, Lalu Parman, dan Ufran Ufran. 2023. "Tindak Pidana Pemasaran Dan Pengancaman Melalui Media Sosial (Studi Putusan Pengadilan Negeri Mataram Nomor 272/Pid.Sus/2019/PN.MTR)." *UNES Law Review* 5(3):1167-88. <https://doi.org/10.31933/unesrev.v5i3.409>.
- Suwandono, Agus. 2023. "Pemahaman Aspek-Aspek Hukum Perjanjian dalam Perancangan Kontrak untuk Mewujudkan Perlindungan Para Pihak." *Abdibaraya: Jurnal Pengabdian Masyarakat* 2(01):1-8. <https://doi.org/10.53863/abdibaraya.v2i01.783>.
- Syamila, Najma, Gunardi Lie, dan Moody Rizqy Syailendra. 2023. "Tindak Pemasaran Dalam Penagihan Pinjaman Online Berdasarkan Hukum Positif Di Indonesia." *SERINA: Jurnal Serina Sosioal Humaniora* 1(1):1-6. <https://doi.org/10.24912/jssh.v1i1.24567>.
- Tan, David. 2021. "Metode Penelitian Hukum: Mengupas Dan Mengulas Metodologi Dalam Menyelenggarakan Penelitian Hukum." *Nusantara: Jurnal Ilmu Pengetahuan Sosial* 8(8):2463-78. <https://doi.org/10.31604/jips.v8i8.2021.2463-2478>.
- Tanri, Mark. 2023. "Kepastian Hukum Bagi Kreditur (Lender) Terkait Transaksi Peer to Peer Lending Dalam Sistem Lembaga Keuangan di Indonesia." *Jurnal Multidisiplin Indonesia* 2(9):2931-44. <https://doi.org/10.58344/jmi.v2i9.572>.
- Tobing, Elida. 2023. "The Effect of Using Financial Information Service System (SLIK) on Bad Credit Rate in Fintech Peer to Peer Lending." *International Journal of Social Service and Research* 3(7):1772-84. <https://doi.org/10.46799/ijssr.v3i7.444>.
- Vaddhano, Nyana. 2023. "Pemasaran Berbasis Big Data Dalam Revolusi Industri 4.0:

Sebuah Perspektif Etika Bisnis.” *Ulil Albab: Jurnal Ilmiah Multidisiplin* 2(2):910-20.  
<https://doi.org/10.56799/jim.v2i2.1178>.

Wahdah, Azzhara Nikita, dan Irwan Triadi. 2025. “The Study of Natural Law in The Philosophy of Law on Legal Thought in Indonesia.” *Jurnal Media Hukum Indonesia (MHI)* 3(4):487-94. <https://doi.org/10.5281/zenodo.17610564>.

Wahyuni, Sry, dan Elwidarifa Marwenny. 2020. “Tinjauan Yuridis Terhadap Tindak Pidana Pengancaman dalam Undang-Undang Informasi dan Transaksi Elektronik.” *UIR Law Review* 4(2):51-58.  
[https://doi.org/10.25299/uirlrev.2020.vol4\(2\).6468](https://doi.org/10.25299/uirlrev.2020.vol4(2).6468).

Waliden, Ibnu Alwaton Surya, Selvia Fitri Maulida, dan Mochammad Agus Rachmatulloh. 2022. “Tinjauan Asas Equality Before the Law terhadap Penegakan Hukum di Indonesia.” *Verfassung: Jurnal Hukum Tata Negara* 1(2):123-42.  
<https://doi.org/10.30762/vjhtn.v1i2.186>.

Waluyo, Bambang. 2022. *Viktimologi Perlindungan Korban Dan Saksi*. diedit oleh Tarmizi. Jakarta: Sinar Grafika.

Waluyo, Bing. 2022. “Kajian Terhadap Perbuatan Melawan Hukum Berdasarkan Pada Pasal 1365 Kitab Undang-Undang Hukum Perdata.” *Cakrawala Hukum: Majalah Ilmiah Fakultas Hukum Universitas Wijayakusuma* 24(1):14-22.  
<https://doi.org/10.51921/chk.v24i1.186>.

WN, M. Devin Aprilian. 2022. “Analisis Kriminologis Kejahatan Pengancaman Terhadap Nasabah Pinjaman Online.” Universitas Lampung.