ACTIO

ISSUE NO. 6 / DECEMBER 2017

Tips for Running an e-Wallet Business

IT Laws & Regulations: Miscellaneous Info

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Axio Magazine is published every four months, made and distributed by:

ANGGRAENI and Partners

Technology is a useful servant but a dangerous master

-Christian Lous Lange-

Valued readers,

We hope this issue of ACTIO finds you well.

In this issue, ACTIO discusses the dawn of a technology that has made our lives easier, along with its regulation in Indonesia. The influence of technology becomes so tangible when we are now able to order our means of transportation online. Even more so, technology has ushered in the development of artificial intelligence and the existence of electronic money.

On one hand, the arrival of technology helps to make human lives easier, but its existence should be accompanied with clear and firm regulations on the accountability and legal consequences for its use. This is certainly necessary to prevent the number of crimes in the "cloud" world, which has started to raise concerns, from increasing even higher.

In this edition, Actio also re-covers the 5th Anniversary of Anggraeni and Partners (AP) Law Firm. As a newly-established organization, Anggraeni and Partners hope to take even firmer steps towards success. Being able to reach their 5th year in the business, Anggraeni and Partners acknowledge that it is because of God's blessing and the immense support from all staffs and readers. On behalf of the entire management and staffs of Anggraeni and Partners, we would like to express our gratitude and humbly ask for sincere prayers that safety, success and happiness continue to be with Anggraeni and Partners always.

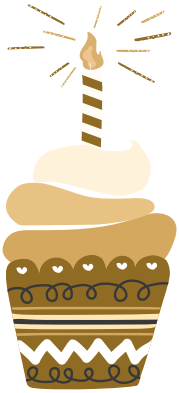
Finally, please enjoy reading this issue and happy new year 2018.

Warmest regards,

ANGGRAENI AND PARTNERS

Setyawati Fitri A, S.H., LL.M., FCIArb
Managing Partner

HAPPY 5TH ANNIVERSARY, AP!



Entering its 5th year, AP held a working meeting at Grandhika Iskandarsyah Hotel to align the law firm's vision and mission. The working meeting was held from 28-29 October 2017 and attended by the management as well as staffs.

The working meeting was held to prepare AP in facing competition and developing as an organization as well as individuals within it, since AP believes that only by developing the organization as well as the individuals within AP will the organization be capable of competing at an international level.

In addition, as an expression of gratitude, on 24 October 2017, AP held a Koran Recital and Koran Complete Reading Competition for children at an orphanage.

The series of celebratory events was concluded with cake cutting and candle blowing, and last but not least, saying a prayer of thanks to God for continuously blessing AP in doing good works. The prayer was said by Ms. Setyawati Fitri A, S.H., LL.M, FCIArb as Managing Partner, and Mr. Ins. Gen. Pol. (Ret.) Drs. H. Mudji Waluyo, S.H., M.M. as AP Founder. **(RFI)**

ANGGRAENI AND PARTNERS WELCOME TWO CONSULTANTS TO STRENGTHEN TEAM

We warmly welcome our 2 (two) consultants at Anggraeni and Partners: Ms. Imelda Napitupulu, S.H., M.H. (Legal Counsel) and Mr. Dr. Hary Elias, B.A., LL.M., MBA (General Counsel).

Ms. Imelda is a senior advocate with more than 20 years of experience in civil litigation, commercial and arbitration practices. We believe that having her in our team will contribute to strengthening the team's unity and improving our legal services to our current and future clients.

Mr. Hary Elias is a professional focusing on enhancing the soft skills in legal services. He is experienced in practicing his expertise in the UK and USA. His presence in our team will certainly broaden insight and accelerate the improvement of associates' skills in providing services to the clients. **(RFI)**

ONLINE LAND TRANSPORTATION MODES BANNED FROM OPERATION IN WEST JAVA

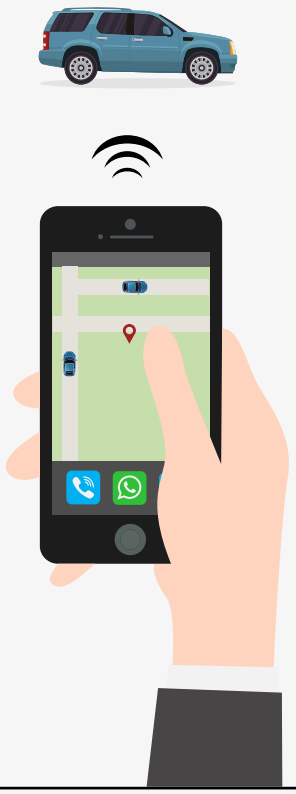
The government of West Java Province, in this case the Transportation Office of West Java Province (Dishub Jabar) signed a mutual agreement with the West Java Forum of Alliance for Transportation Aspirations (WAAT) in the form of a mutual statement dated 6 October 2017[1] . The agreement between Dishub Jabar and WAAT among others states to ban the operation of land transportation modes run via information technology-based applications, also known as online-based transport, until there is a clear regulation on this type of transportation.

The absence of clear regulations on online transport is the basis for such ban of transport operation in West Java region. Such legal void can cause disruption to national security and order (kamtibmas), so Dishub Jabar needs to temporarily suspend the operation of online-based transport, pending clear regulation on this matter.

The operation of online-based transport was regulated for the first time under Transportation Minister Regulation Number 32 of 2016 regarding Non-Route Public Transportation Services ("MR 32/2016"). MR 32/2016 was then amended through Transportation Minister Regulation Number 26 of 2017 regarding Non-Route Public Transportation Services ("MR 26/2017"). In this matter, MR 26/2017 regulates with greater detail, the online-based transport which is referred to in this regulation as a "special rental transport".

On 20 June 2017, the Supreme Court through its decision number 37P/HUM/2017 ("Supreme Court Decision") revokes several provisions in MR 26/2017 which regulates the upper and lower threshold pricing for online-based transport; obligation to have complete legal vehicle documents such as vehicle ownership certificate under legal entity name and vehicle roadworthiness license; obligation to have at least 5 (five) vehicles to obtain commercial transportation service permit; as well as obligation to attach type testing registration certification (SRUT) to obtain commercial transportation service permit.

The regulation also revoked the prohibition for information technology-based application service providers ("application providers")



to act as public transportation service providers in activities such as (i) setting tariffs and providing promotional tariffs below the lower threshold pricing determined, (ii) recruiting drivers, (iii) providing application access to individuals as transportation service providers, and (iv) providing application access to public transportation service providers which have not acquired the license for non-route commercial public transportation services.

Revocation of several points in Transportation Minister Regulation 26/2017 by virtue of the Supreme Court Decision has created a void of law which regulates the operations of online-based transport. To the date of writing of this article, Transportation Minister Regulation Number 108 of 2017 regarding Non-Route Public Transportation Services ("MR 108/2017") has been promulgated. MR 2018/2017 was the government's answer to the post-Supreme Court Decision legal void of a regulation which governs the operations of online-based transport.

The writer is of the opinion that with the MR 108/2017 promulgated, the regulation is expected to become a legal umbrella for online-based transport that will enable them to operate in West Java region. Therefore, the business of rental transportation in West Java would be prevented from monopolistic[2] practices and a healthy climate of business competition in rental transport will be created in West Java. **(KSF)**

1. ADAPTED FROM HTTPS://WWW.CNNINDONESIA.COM/TEKNOLOGI/20171010152820-384-247416/DISHUB-JABAR-RESMI-LARANG-TRANSPORTASI-ONLINE-BEROPERASI/
2. THE CENTRALIZATION OF ECONOMIC POWER BY ONE OR MORE BUSINESS PLAYERS CAUSING CONTROLLED PRODUCTION AND/OR MARKETING OF CERTAIN GOODS AND/OR SERVICES AND THEREFORE CREATING AN UNHEALTHY BUSINESS COMPETITION WHICH MAY HARM PUBLIC INTEREST.

ARTIFICIAL INTELLIGENCE (AI) AND ITS CHALLENGES TO THE INDONESIAN LAW

Artificial Intelligence (AI) is a term that would remind us of the greatness of robots or systems which are often synonymous with the ability to act like humans. With the extremely massive and progressive development of technology and computer systems, instead of aiding man's roles, artificial intelligence has been gradually used to replace human roles in certain jobs.

Although the development of AI has only been noticeably massive since a few years ago, history has proven that artificial intelligence has become the scope of experts' research long before the internet developed and touched every aspect of our lives as we know it.

H. A. Simon (1987) defined artificial intelligence into the areas of research, application and instructions associated with computer programming to do things which, in man's view, are deemed intelligent. Furthermore, Rich and Knight (1991) defined artificial intelligence as a study on how to make computers do things which are currently done better by humans.

According to BBC, put simply, AI is a "machine" capable of doing various things where, if done by humans, intelligence is considered required, such as understanding human language naturally, facial recognition in photographs, driving vehicles or even guessing what books we like based on the books we have read before.

Google Assistant which can be found in Pixel smartphones, or Siri in the hardware ecosystem of Apple, and Cortana in Windows operating system, are perhaps representatives of such technology. If we look even closer, the simplest AI can actually be found in calculators, or when we process some data using Microsoft Excel.[1]

Artificial intelligence system becomes even increasingly developed in our economy and society, and is designed with increasingly improved capabilities to operate independently from humans' direct supervision. The algorithm system in stock market dealings and autonomous vehicles with AI "drivers" which have been road-tested are all serious examples of how AI has had brushes with the law.

AI which might become very close to interacting with humans are bots, computer programs on social media. AI bots have become increasingly advanced and sophisticated as they could interact in dialogs with real humans. This has garnered attention of cyber law experts in the US.

In 2016, in the US, an AI bot known as Jill Watson – tasked as an assistant teacher in an online course in Georgia Tech University – managed to fool

and trick students into thinking that it was an actual human being.[2]

A more serious example is the widespread use of Pro-Trump political AI bots on social media several days before the US presidential election in 2016.[3] Because of the incident, the US cyber law experts pushed the Congress to amend the law in order to restrict and regulate the use of AI.

Despite AI's potentially extensive legal impact within the society, particularly concerning the legal accountability pertaining to it, the Indonesian legal system itself has not expressly regulated the issue. This has raised a number of questions, such as how the legal system can ensure that victims are properly compensated if an AI causes a physical or economic damage? In addition, there is also the question of how AI can have the same treatment as humans when it comes to legal accountability? Or to what extent should a system owner be held accountable for the actions of such autonomous AI system?

In order to address these questions, at least a few things need to be considered. Discussing legal accountability means also discussing the capacity of a legal subject to be held accountable.

Explicitly, although AI is capable of taking actions included as legal actions, it cannot be identified as a legal subject. Therefore, an alternative is required while still associating the AI's actions with the legal subject that is the AI's owner.

We can find an alternative by conducting analogical analysis or interpretation. Analogical interpretation provides interpretation of the wording in a legal regulation through analogies in accordance with its legal principles. Therefore, an incident which actually cannot be included in the definition of a certain regulation can be otherwise considered included by the wording of such regulation.

By using analogical interpretation, the association between an AI and its owner can be illustrated in the following examples:

1. Relationship between a pet and its owner

As the first alternative, we can draw an analogy between the relationship of an AI system and its owner and the relationship between a pet and its owner or user, as referred to in Article 1368 of the Indonesian Civil Code ("KUHPer"):

"An owner of an animal, or an individual who uses one, as long as the animal is available for his use, shall be responsible for any damage caused by the animal, whether the animal is under his supervision and in his care, or whether it is lost or has escaped."

In civil law, if a pet causes damage, whether the pet is under its owner's or user's supervision, or whether the pet is lost or has escaped, such damage becomes the responsibility of the pet's owner or user.

Similarly with AIs, due to its autonomous nature, AIs can be considered analogous to that of a pet under its owner's or user's supervision. Hence, if an autonomous AI performs any action unforeseen by its user or owner, the incident can also be considered analogous to that of a "lost or escaped" pet. Therefore, if an AI commits any action which, by law, impairs or harms other people, the owner can be held accountable, under civil law, for the AI's action.

2. Relationship between an employee and an employer

The relationship between an AI and its owner can also be considered analogous to that of an "employee" and an "employer", as set forth in Article 1367 paragraphs (1) and (3) of the Indonesian Civil Code ("KUHPerdata"), which states:

Article 1367 paragraph (1)

"An individual shall be responsible not only for the damage he has caused by his own act, but also for that which was caused by the acts of the individuals for whom he is responsible, or caused by matters which are under his supervision."

Article 1367 paragraph (3)

"Employers and those who have been assigned to manage affairs of other individuals shall be responsible for the damage caused by their servants and subordinates in the course of duties assigned to them."

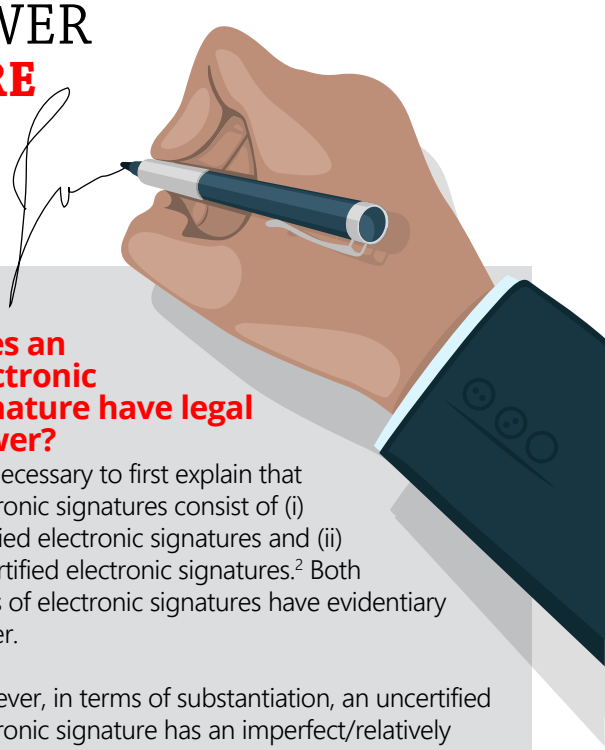
Considering the aforesaid provisions of such articles, we can draw an anthropomorphic analogy by identifying the attribution of "worker" characteristics in an AI system. Besides, the use and application of AI in daily lives are aimed at doing works which could actually be done by humans. If AIs are considered analogous to "workers", the legal accountability could be attributed to its owner that can also be considered analogous to the AI's "employer".

Technological advancement is inevitability. To anticipate it, therefore, the law should be constantly updated to cope with technological developments. Nevertheless, the use of AI systems must always comply with the entire set of laws applicable to their human operators.

No matter how autonomous AI systems become, we cannot let go of their reins and let them "run freely" without setting boundaries and regulations for such systems. Finally, while it is true that the Indonesian legal system has provided means to fill the legal void through analogy, the alternative analogies proposed above are hoped to provide a brief overview of how this area of cyber law will evolve in the future. **(MSB)**

1. https://tirto.id/masa-depan-dunia-di-tangan-ai-b4Xw
2. https://www.nytimes.com/2017/09/01/opinion/artificial-intelligence-regulations-rules.html
3. Ibid.

FUNCTION & LEGAL POWER OF ELECTRONIC SIGNATURE IN INDONESIA



What is an electronic signature?

Article 1 sub-article 12 of Law Number 11 of 2008 regarding Electronic Information and Transaction ("EIT Law") defines electronic signature as a signature that contains electronic information attached to associated or linked with other electronic information used as means of verification and authentication. Further, the law provides that electronic information is a set of electronic data, such as texts, images, arrangement of letters, or symbols that have been processed for meaning and are understandable to persons qualified to understand them.[1]

Regulation for the implementation of electronic signatures is provided in Government Regulation Number 82 of 2012 regarding Operation of Electronic Systems and Transactions ("GR 82/2012").

What is the function and purpose of an electronic signature?

In general, electronic signatures are aimed to facilitate users of technology systems. Nowadays, many activities are already conducted electronically using digital systems. An example is the need for approval from an individual for an electronic transaction in an electronic information system and/or on an electronic document.

If we refer to the provision of Article 52 of GR 82/2012, electronic signatures have two purposes:

1. As an authentication and verification of signer's identity and its integrity; and
2. As an authentication and verification of the authenticity of electronic information.

Does an electronic signature have legal power?

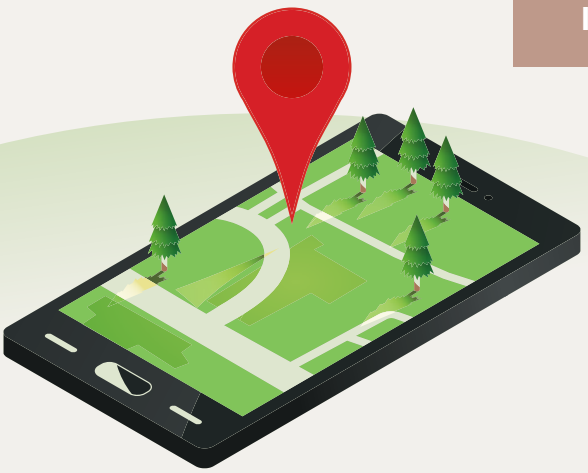
It is necessary to first explain that electronic signatures consist of (i) certified electronic signatures and (ii) uncertified electronic signatures.[2] Both types of electronic signatures have evidentiary power.

However, in terms of substantiation, an uncertified electronic signature has an imperfect/relatively weak evidentiary value, as uncertified electronic signatures can be denied by the signer concerned. In addition, uncertified electronic signatures is also relatively easy to change or forged by other people.

The case with certified electronic signatures is different. Certified electronic signatures are issued by electronic certification operators verified with an electronic certificate.[3] The validity of signer of such electronic signature has been verified by the electronic certification operator, so it has a solid protection and substantiation, as the validity is traceable and verifiable.

Those intending to create electronic signatures may submit an application to the electronic certification operator, among others the Directorate General of Informatics Applications at the Ministry of Communication and Informatics, as well as the Financial Services Authority for financial services.

1. Article 1 sub-article 1 of EIT Law.
2. Article 52 paragraph (1) of GR 82/2012.
3. Article 52 paragraph (2) of GR 82/2012.



PRESIDENTIAL REGULATION NUMBER 74 OF 2017: E-COMMERCE ROADMAP FOR THE YEAR 2017-2019

The government has promoted the acceleration and development of a national electronic-based commerce system (e-commerce) by stipulating Presidential Regulation No. 74 of 2017 regarding E-Commerce Roadmap for the Year 2017-2019 ("PR 74/2017"), effective as of 3 August 2017.

The 2017-2019 National Electronic-Based Commerce System ("2017-2019 National E-Commerce Roadmap") is a document that provides direction and steps of preparing and implementing commercial transactions which are based on a range of electronic devices and procedures.

The 2017-2019 National E-Commerce Roadmap includes a number of programs, among others: (i) funding; (ii) taxes; (iii) consumer protection; (iv) education and human resources; (v) communication infrastructure; (vi) logistics; (vii) cyber security; and (vii) Notification of the Implementing Management on 2017-2019 National E-Commerce Roadmap.

The government has established a Steering Committee for the 2017-2019 National E-Commerce Roadmap led by the Coordinating Minister for the Economy, the Minister of Home Affairs, the Minister of Commerce, the Minister of Cooperatives and Small and Medium Enterprises, the Minister of Transportation, the Governor of Bank Indonesia and the Chairman of the Board of Commissioners of the Financial Services Agency (OJK).

The duties of the Steering Committee for the 2017-2019 National E-Commerce Roadmap are: a) conducting coordination and synchronization of implementation of the 2017-2019 National E-Commerce Roadmap; b) directing steps and policies to resolve issues and overcome obstacles in the implementation of 2017-2019 National E-Commerce Roadmap; c) monitoring and evaluating the implementation of the 2017-2019 National E-Commerce Roadmap; and d) amending the 2017-2019 National E-Commerce Roadmap as necessary.

In performing their duties, the Steering Committee for the 2017-2019 National E-Commerce Roadmap is assisted by various parties, among others the implementation team and prominent source persons. The duties, work procedures and composition of the implementation team and prominent source persons are set forth in a Decision of the Coordinating Minister for the Economy, as the Chairman of the Steering Committee.

This 2017-2019 National E-Commerce Roadmap is useful as a reference for the central and regional governments in determining policies by sectors and preparing action plans in order to accelerate the implementation of e-commerce systems. It also serves as a useful reference for stakeholders in implementing e-commerce activities. **(KBA)**

OPINION

IMBALANCE IN THE IMPLEMENTATION OF THE ELECTRONIC INFORMATION AND TRANSACTION LAW ON DEFAMATION IN THE CONTEXT OF THE ELECTRONIC INFORMATION AND TRANSACTION LAW

The development of the internet has compelled a shift in law. In general, the Western democratic system views the defamation law as an attempt to find a balance between an individual's right to the freedom of expression and the need to protect other people's reputation.

Different needs in a society imply different standards for its people's conduct. This article will first discuss the legal framework of defamation in Indonesia concerning electronic communication. Next, readers will be invited to consider whether balance is presently required. Finally, the writer will conclude with an opinion that a shift in law is required.

The Indonesian Criminal Code provides a number of articles concerning defamation. Defamation against individuals is particularly governed in Chapter XVI, which encompasses several criminal acts. The second relevant law is the constitutional guarantee provided in Article 28 of the 1945 Constitution.

However, it is necessary to note that constitutional guarantee did not anticipate that any individual with a smartphone can interact with millions of people beyond geographical boundaries, countries, ethnicities, races and religions.

Another provision related to the protection of the freedom of speech is Law Number 39 of 1999 regarding Human Rights, which governs the right to communicate, disseminate and express opinions in public.

Indonesia has also adopted the multilateral agreement called the International Covenant on Civil and Political Rights (ICCPR) into Law No. 12 of 2015. Article 19 of the covenant provides that:

1. Every person has the right to maintain their opinion without harassment;
2. Every person has the right to the freedom of expression; this right includes the freedom to seek, receive and provide any information or ideas, regardless of limitations, whether verbal, written or printed, in the form of art or through any other media of their choosing.

Despite seemingly ample guarantees to the freedom of expression, surprisingly the electronic and online communication has completely twisted these guarantees.

Let us look more closely at the law concerning uploads on Facebook, Instagram and WhatsApp. It is reasonable that electronic communication be governed by the Electronic Information and Transactions Law. In particular, defamation using the internet as medium is specifically provided in Law No. 11 of 2008 and Law No. 19 of 2016 regarding Electronic Information and Transactions ("EIT Law").

Article 27 (3) in connection with Article 45(3) of the EIT Law provides that:

> *"Any person deliberately and without authorization distributes and/or transmits and/or causes the accessibility of an electronic information and/or electronic document whose content violates ethical norms as referred to in Article 27 paragraph (1) shall be subject to criminal sanction of imprisonment for a maximum of 6 (six) years and/or fine in a maximum amount of Rp1,000,000,000.- (one billion rupiah)."*

The issue is that the implementation of EIT Law has sparked many cases where freedom of expression on the internet winds up in court. Legislators and judges are therefore expected to consider not only the statement in Article 27(3) and find a more balanced approach between the freedom of expression and a person's right to not be insulted. This can be achieved in two ways.

First, all related parties must observe the Constitutional Court Decision No. 50/PUU-VI/2008. The Constitutional Court was of the opinion that the EIT Law cannot be implemented exclusively; it must be implemented in conjunction with Articles 310 and 311 of the Indonesian Criminal Code. In other words, any violation of the EIT Law must also take into account the defense provided for in the Indonesian Criminal Code.

The Constitutional Court proposed the following reason for its decision:

> *"Considering that both the House of Representatives and the Experts presented by the Government have explained before the Court hearing that Article 27 paragraph (3) of the EIT Law does not govern legal norms for new crimes, but only affirms the enactment of legal norms for the crime of defamation in the Indonesian Civil Code into a new law due to a special additional element, namely developments in electronic or cyber areas with highly specific characteristics. Therefore, the interpretation of norms contained in Article 27)3 of the a quo Law concerning defamation and/or slander, is inseparable with the norms of criminal law set forth in Chapter XVI regarding Defamation, as set out in Articles 310 and 311 of the Indonesian Criminal Code, so the constitutional aspect of Article 27 paragraph (3) of the EIT Law must be read in conjunction with Articles 310 and 311 of the Indonesian Criminal Code.*

This decision is vital and the practitioners must refer to this case when defending a person against the EIT Law.

The second approach is for the legislative body to extend the law by codifying a special defense contained in another system. Some general defense arguments that came across the writer's mind might help to improve balance in supporting the freedom of expression on the internet. These include justification, qualified privilege and fair comment.

Almost all jurisdictions of the common law shows that defamation is generally associated with untrue claims. When truth is proclaimed, it should be the perfect defense against any claim for defamation, regardless of the fact that a person feels offended after reading it. This is not only about common sense,

but also concerns the people's need for a more transparent and accountable government.

No one can be asked for accountability for disseminating truth. Consequently, an expression of opinion cannot be generally made as a sufficient ground for prosecution. You can choose to agree or disagree with someone's opinion, but you cannot sue them at court for such an opinion.

Legislators can also turn to qualified privilege as an argument. Qualified privilege protects truthful communication in certain situations. Consequently, qualified privilege even allows insulting comments in certain situations, unless there is an element of malicious intent in creating the upload or comment.

"Malice" generally means that an upload was created on the basis of some ulterior motives and not a truthful communication. Whether or not malice is proven, it is the court's duty to decide so upon consideration of the evidence available. To reiterate, the law can clarify that qualified privilege is not defense when the uploader is aware that the fact in the information uploaded is untrue.

Qualified privilege can be applied among others in a battle of comments about political candidates during an election, the services of a hospital or a general analysis on the services provided.

Situations protected under qualified privilege are too many to list. Even so, there are some guiding principles that can be used by legislators and courts to determine whether qualified privilege can serve as the basis for defense.

Such matter is important, particularly in communications among people with legal or moral relationship with each other. For instance, giving information to the police about a criminal, or sharing information from a businessman to another about the character or performance of a former employee.

Legislators also need to consider fair comment as a defense argument. Fair comment defense in common law applies to comments or opinions on matters pertaining to public interest.

In reality, however, comments do not have to be fair. It only takes an opinion, no matter how prejudiced, for a person to honestly maintain.

The aspect protected by fair comment is that uploads or messages must concern public interest. This includes comments about the government, public administration services and public agencies, as well as general criticisms such as about music, performances and movies.

Readers must also understand that uploads constitute opinions and are not facts. Comments must also be based on accurate facts. Similar to qualified privilege, the fair comment defense cannot be applied if a comment is made with malice.

As a final analysis, the general consensus is that the EIT Law requires further revision. The internet is merely a tool, although it is something powerful that can enable every person to easily reach millions of audience.

Communication must undoubtedly be done responsibly. It is acknowledged that every person has the right to protect their character and position in the society. However, balance must be applied. The freedom of expression is a vital right which forms part of the hopes of the Founding Fathers for the entire Indonesian people. It should not be easily muzzled by overly-sensitive claimants who come running to the court every time they find even the most trivial issues on the internet. **(HE/ADP)**

RUNNING AN E-WALLET BUSINESS

Electronic wallet or more popularly known as e-wallet ushered in the era of digital transactions. In order to provide certainty and legal umbrella for the existence of e-wallets, Bank Indonesia has issued Bank Indonesia Regulation Number 18/40/PBI/2016 regarding Implementation of Payment Transaction Processing ("BI Regulation No. 18/2016") and Bank Indonesia Circular Letter No. 18/41/DKSP dated 30 December 2016 regarding Implementation of Payment Transaction Processing ("BI Circular Letter No. 18/2016"). What points to note for those interested in running an e-wallet business?

#1 General Requirements:

- The party submitting an application for e-wallet license must be in the form of a Bank; or
- for Non-Bank Institutions, must be in the form of a limited liability company (while also taking into account the sufficiency of paid-up capital of at least Rp3,000,000,000.- (three billion rupiah));
- Banks or Non-Bank Institutions conducting Electronic Wallet business with active users reaching or planned to reach at least 300,000 (three hundred thousand) users.[1]

#2 Feasibility Criteria for Service Operators:

- Legality and profile of the company;
- Legal aspects;
- Operational preparedness;
- System security and reliability;
- Business feasibility (while also taking into account the sufficiency of paid-up capital of at least Rp3,000,000,000.- (three billion rupiah));
- Risk management adequacy (while also taking into account the sufficiency of paid-up capital of at least Rp3,000,000,000.- (three billion rupiah)); and
- Consumer protection

Fulfillment of the criteria for feasibility aspect above, in terms of legality and profile of the company must be substantiated with documents according to the type and material specified in Annex I point C of BI Circular Letter No. 18/2016. **(EDN)**

1. Article 8 of BI Regulation No. 18/2016

ANGGRAENI and Partners

SPECIALIZATION

CRIMINAL LAW

CORPORATE LAW

COMMERCIAL DISPUTES

MARITIME LAW

ARBITRATION

OUR VISION

Becoming a prominent Indonesian law firm applying international standards and capable in competing regionally, with an objective to contribute significantly for the development of the Indonesian legal system, having the progress of the nation in sight as well as consistently creating added values to all parties.

OUR MISSION

- Establishing a sustainable law firm consisting of trusted and reliable attorneys, supported by a strong and qualified business management in accordance with the condition in Indonesia, as well as being committed in providing integrated and quality legal services to the clients and the communities;
- Consistently establishing and developing the quality of human resources through scientific researches, trainings and innovations based on the organizational and cultural values of Indonesia;
- Maintaining the continuity of growth in legal services through consistent improvement of service.

OUR VALUE

"Dedication in service for a sustainable growth and partnership in order to create added values for the clients."

WE ARE **WORTHY** *Of Your* **TRUST**

OUR LATEST EXPERIENCE

2016

ACTING AS AN ATTORNEY for Indonesian state owned company in a civil proceeding related to tort.

PROVIDING ADVICE in related to shipping dispute for Indonesian shipping company.

PROVIDING ADVICE for an independent Power Producer company in related for financing.

2015

ACTING AS AN ATTORNEY for an Indonesian shipping company in its capacity as a respondent in a bankruptcy proceeding at the Commercial Court in the District Court of Central Jakarta;

2014

DRAFTING AND ANALYZING shipping contracts for a palm oil plantation company;

2013

REPRESENTING a Japanese private company as a foreign shareholder in a joint venture in the transfer of shares to a domestic shareholder, in a manpower outsourcing joint venture.