

Legal Protection for Customers Victims of Savings Account Break-ins Crime



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ABSTRACT: This study aimed to analyze the role of Bank Indonesia (BI) and the Otoritas Jasa Keuangan (OJK) of the banking activities in Indonesia and to analyze the legal protection of bank customers. There are two issues discussed in this study, the first regarding the role of OJK and Bank Indonesia in supervising crime in the banking world and the second regarding legal protection for customers victims of savings accounts break-ins crime. The research method used was normative juridical, by studying and reviewing legal principles derived from library materials. The discussions that were discussed in this article were how the role of OJK and Bank Indonesia in supervising crime in the banking world and how legal protection is for customers who are victims of savings account burglary in Indonesia. The Otoritas Jasa Keuangan regulation (PJOK) also requires banks to compensate for losses suffered by customers. Article 29 PJOK Number 1/PJOK.07/2013 states "Otoritas Jasa Keuangan is required to be responsible for Consumer losses arising from errors and/or negligence, management, employees of Financial Services Business Actors and/or third parties working for the interests of the Financial Services Providers. Financial Services Business. Lawsuits that can be pursued through the courts can be in the form of criminal charges or civil lawsuits. Embezzlement of bank customer deposits may be subjected to Article 372 and Article 374 of the Criminal Code (KUHP).

KEYWORDS: Protection, Piercing, FSA, Customers, Banking

INTRODUCTION

Banking is a financial institution that plays a very important role in national development activities and international trade. Banking is a financial institution that is a place for individuals, private entities, even government institutions, and agencies to keep their funds.¹ Article 1 point 2 Law Number 10 of 1998 concerning Banking, defined that Bank is a business entity that collects funds from the public in the form of savings and channels them to the public in credit and or other forms to improve the standard of living of many people. Banks have a great responsibility for economic development. These responsibilities were derived from duties and functions as an intermediary between the funds held by people then channeled back in the form of credit that will be used as an alternative to increasing economic establishment that it is true if a bank is a factor that can boost economic growth.² Toward losses suffered by the customer, the Bank Indonesia explained, legal protection against the loss of customers can be seen through Bank Indonesia Regulation Number 16/1/PBI/2014 on Consumer Protection Service Payment System. Consumer Protection of Payment System Services, hereinafter referred to as Consumer Protection, is any effort that guarantees legal certainty to provide protection to Consumers of Payment System Services.³ When customers feel any suspicious transactions on their account, they can immediately contact the bank where the customer opened an account. After the bank receives a report or complaint from the customer, the bank will investigate the incoming report based on the available evidence following the existing rules/procedures. Bank customer protection absolutely must be done by the bank in accordance with the nature of the business carried out by banks, which is creating a sense of security for their customers.⁴

¹ Suherman, 'Upaya Mediasi Dalam Penyelesaian Sengketa Di Lembaga Perbankan', *ADHAPER: Jurnal Hukum Acara Perdata*, 4.1 (2018), 109-122. p. 110.

² Dennij Mandeij Margareta Waworuntu, Tri Oldy Rotinsulu, 'Peran Sektor Perbankan Dalam Mengembangkan Daya Saing Usaha Mikro Kecil Dan Menengah (UMKM) Indonesia Memasuki Pasar MEA 2010-2015', *Jurnal Berkala Ilmiah Efisiensi*, 17.1 (2017), 183-193. p. 184.

³ Reza Aditya Pamuji, 'Perlindungan Hukum Bagi Nasabah Dan Tanggung Jawab Bank Dalam Kasus Card Skimming', *Jurnal Lex Renaissance*, 3.1 (2018), 25-43. p. 37,38.

⁴ Kristie Thomas, 'Law, Analysing the Notion of "Consumer" in China's Consumer Protection', *The Chinese Journal of Comparative Law*, 6.2 (2018), 294-318.

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The legal relationship between the customer and the bank is based on the existence of an agreement between them. The agreement between the customer and the bank contains the rights and obligations of each party.⁵ The agreement is based on law, as regulated in Article 1339 in conjunction with Article 1347 of the Civil Code, an agreement is not only binding for things that are expressly stated in it, but also for everything which according to the nature of the agreement, is required by propriety, customs or laws.⁶ This means that the legal relationship that occurs between the customer and the bank has been regulated in the Civil Code and must be carried out following what has been written in the agreement. It is common that customer confidence towards the banks will disappear or can be lost to the bank for their actions or crimes that exist in banking, such as account break-ins. Banking offenders can be divided into two groups, the first one is the bank outsider, and the second comes from the bank environment itself. Which belong to the category of people outside banks, namely hackers and robbers. The category of people in the bank environment is bank employees. As an example of a case that occurred in 2021, namely Bank Riau Kepri customer burglary, the Riau Police arrested two former tellers of PT Bank Riau Kepri or BRK with the initials AS and NH, suspected perpetrators of breaking into customer deposits worth Rp 1.3 billion, the arrest was made on Wednesday, March 31, 2021. The crime mode was revealed after three BRK customers reported that their savings had decreased to Rp 9.7 million remainings. In fact, since saving from 2005, these customers admit that they have never withdrawn funds from their accounts.⁷ Indonesian banking has entered a new phase, after the Financial Services Authority (*Otoritas Jasa Keuangan*) Law was ratified on November 22, 2011. Where the regulation and supervision of the banking sector is no longer with only Bank Indonesia but has been transferred to the Financial Services Authority (*Otoritas Jasa Keuangan* – hereinafter abbreviated as OJK), which is an independent institution that has the functions, duties, and authority to regulate, supervise the examination and investigation of financial services in Indonesia, thus all financial service activities in the banking sector, capital market, insurance, pension funds, financing institutions, and other financial service institutions are under the authority of the OJK. Problems in the banking world that are carried out by internal or external parties, it is appropriate that the OJK investigates and examines what has happened so that customers feel that the problems that are currently happening can be resolved with the role of OJK and Bank Indonesia in the banking system in Indonesia. Based on the description of the problems above, this research formulated the following problems; What is the role of OJK and Bank Indonesia in supervising crime in the banking world? and How legal protection for customers victims of savings accounts break-ins crime in Indonesia?

METHOD

The research method used in this study is a normative juridical approach, the law is conceptualized as norms, rules, principles, and jurisprudence. The normative juridical research uses a research literature study conducted by reviewing the applicable laws and regulations or applied to a legal problem. The sources of legal materials in this study consist of primary legal materials and secondary legal materials. Primary legal materials are legal materials that have general binding power obtained from statutory regulations. Secondary law is material that comes from the study of literature such as books, legal materials collected from the internet that correlates with the object of this study.

RESULTS AND DISCUSSION

1. The Role of OJK and Bank Indonesia in Supervising Crime in the Banking World

Before the establishment of OJK Law, banks are supervised and regulated by the Bank Indonesia (BI). Bank Indonesia is a central bank that is a state institution that has the authority to issue legal instruments of payment from a country, formulate and implement monetary policies, regulate and supervise banking and carry out the function as *lender of last resort*.⁸ This law was taken due to the many problems in the banking sector that occurred during the crisis which resulted in 21 (twenty-one) national private banks were liquidated by Bank Indonesia. Likewise, there was a surprising event that Bank Century was designated by Bank Indonesia as a failed bank with a systemic impact. The number of problems in the financial services sector in the banking sector that can disrupt financial system stability has increasingly prompted the need for the establishment of an integrated

⁵ Karen Alboukrek, 'Adapting to A New World of E-Commerce: The Need for Uniform Consumer Protection in the International Electronic Marketplace', *George Washington International Law Review*, 35.2 (2003), 420–431.p.424.

⁶ Wafiya, 'Perlindungan Hukum Bagi Nasabah Yang Mengalami Kerugian Dalam Transaksi Perbankan Melalui Internet', *Jurnal Ilmu Hukum Kanun*, 56.14 (2012), 37–52. p. 43.

⁷ S. Dian Andryanto, '6 Kasus Pembobolan Rekening Nasabah Bank Sepanjang 2021, Jebol Miliaran Rupiah', *Tempo.Co*, 2021 <<https://bisnis.tempo.co/read/1448803/6-kasus-pembobolan-rekening-nasabah-bank-sepanjang-2021-jebol-miliaran-rupiah/full&view=ok>> [accessed 20 July 2021].

⁸ Nun Harrieti, 'Kewenangan Bank Indonesia Dan Otoritas Jasa Keuangan Pasca Berlakunya POJK Nomor 1/POJK. 07/2013 Dan POJK Nomor 1/POJK. 07/2014 Terhadap Penyelesaian Sengketa Nasabah Di Indonesia', *Jurnal Ilmiah Hukum DE'JURE: Kajian Ilmiah Hukum*, 1.2 (2016), 329–343.p. 332.

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supervisory institution in the financial services sector.⁹ Regulations regarding the OJK are regulated in Law Number 21 of 2011 concerning the OJK (Financial Services Authority). According to Article 1 explaining that the OJK is an institution that is independent and free from interference from other parties, which has the function, duties, and powers of regulation, supervision, examination, and investigation as referred to in the OJK Law. Institutional independence is also referred to as political or goal independence because this independence means the status of OJK as an institution that is fundamentally separated from the executive or government, free from legislative or parliamentary influence, free to formulate the ultimate goals/targets of its policies without any influence from political institutions and or government.¹⁰ In carrying out bank supervision duties, OJK implements its supervisory system using two approaches. The first is Compliance Based Supervision (CBS), which monitoring the bank's compliance with regulations related to the operations and management of the bank in the past to ensure that the bank has been operating and properly and correctly managed according to precautionary principles. Supervision of compliance aspects is an integral part of the implementation of Risk-based Bank Supervision. And the second is Risk-Based Supervision (RBS), namely bank supervision that uses risk-based strategies and methodologies that enable bank supervisors to detect significant risks early and take appropriate and timely supervisory actions.¹¹ Article 7 of OJK Law regulates the regulation and supervision duty in the banking sector and can be described as follows:

- a. Regulation and supervision of bank institutions which include:
 - 1) Licensing for bank establishment, the opening of bank offices, articles of association, work plans, ownership, management, and human resources, bank mergers, consolidations, and acquisitions, as well as revocation of bank business licenses; and
 - 2) Banking business activities, among others: the source of funding, funding, product hybridization, and activity in the service sector.
- b. Regulation and supervision of bank soundness which includes:
 - 1) Liquidity, profitability, solvency, asset quality, minimum capital adequacy ratio, maximum lending limit, loan to deposit ratio, and bank reserves;
 - 2) Bank reports related to bank health and performance;
 - 3) Debtor information system;
 - 4) Credit testing; and
 - 5) Bank accounting standards.
- c. Regulation and supervision of the prudential aspects of banks, including:
 - 1) Risk management;
 - 2) Bank governance;
 - 3) Know-your-customer and anti-money laundering principles; and
 - 4) Prevention of terrorism financing and banking crimes.
- d. Bank check.

The functions separation of the banking supervision from the central bank also occurs in many countries. The option to put Indonesia's banking supervision function is no longer at Bank Indonesia, are transferred to an independent body which has a legal basis in Law Number 3 of 2004 on the Amendment of the Law Number 23 of 1999 concerning Bank Indonesia.¹² The regulatory and supervisory functions were not fully provided to the OJK. OJK still working with BI and have their respective authorities in performing regulatory and supervisory functions. Institution regulation and supervision, health, banking-prudential aspects, and a bank check are the scopes of micro-prudential which are the duties and authority of OJK. As for the scope of micro-prudential regulation and supervision, OJK coordinates with BI to make moral suasion to banks.¹³

2. Legal Protection for Customers Victims of Crime Savings Accounts Break-ins Crime

A customer in a general sense is someone who saves money or funds in a bank he trusts. There are 2 (two) types of customers, namely debtor customers, and depositors. A debtor customer is a customer who is given credit facility agreements agreed by the bank, while the depositor is a person who feels safe and comfortable place to save their money in the bank as a form of evidence of confidence by the bank concerned. People who make transactions directly at banks without having a savings

⁹ Surti Yustianti, 'Kewenangan Pengaturan Dan Pengawasan Perbankan Oleh Bank Indonesia Dan Otoritas Jasa Keuangan (OJK)', *ACTA DIURNAL Jurnal Ilmu Hukum Kenotariatan*, 1.1 (2017), 60–72.p.64.

¹⁰ Sulistyandari, 'Lembaga Dan Fungsi Pengawasan Perbankan Di Indonesia', *Mimbar Hukum*, 24.2 (2012), 226–240.p. 233.

¹¹ Uswatun Hasanah, *Hukum Perbankan* (Malang: Setara Press, 2017).p.45.

¹² Zulfi Diane Zaini, 'Peralihan Fungsi Pengawasan Lem Baga Perbankan Dari Bank Indonesia Ke Otor Itas Jasa Keuangan', *Pranata Hukum*, 9.1 (2014), 1–14.p.2.

¹³ Muhammad Syafi'i Antonio, *Bank Syariah: Dari Teori Ke Praktik* (Jakarta: Gema Insani Press, 2017).p.10.

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account can also be categorized as customers.¹⁴ The legal relationship between the depositor and the bank is based on an agreement. Therefore, it has become a natural thing if the interests of customers obtain legal protection from the bank. Some rules have been made by the government to protect the interests of bank customers, especially customers who deposit their funds. It's evidenced by the establishment of Law Number 8 of 1999 concerning Consumer Protection, besides there are also other regulations that support the Consumer Protection Law namely Law Number 7 of 1992 jo. Law Number 10 of 1998 concerning Banking. Article 1 point 1 of the Consumer Protection Law defines consumer protection as all efforts that guarantee legal certainty to protect consumers. Consumer protection is very necessary to ensure the equality of interests between producers (in this case, banks) and consumers (in this case, bank customers).¹⁵

Article 4 of Consumer Protection Law regulates consumer rights, including:

- a. the right to comfort, security, and safety in consuming goods and/or services;
- b. the right to choose goods and/or services and to obtain such goods and/or services in accordance with the exchange rate and the promised conditions and guarantees;
- c. the right to correct, clear and honest information regarding the condition and guarantee of goods and/or services;
- d. the right to have their opinions and complaints heard on the goods and/or services used;
- e. the right to obtain proper advocacy, protection, and efforts to resolve consumer protection disputes;
- f. the right to receive consumer guidance and education;
- g. the right to be treated or served correctly and honestly and not discriminatory;
- h. the right to obtain compensation and/or replacement, if the goods and/or services received are not following the agreement or not properly;
- i. rights regulated in the provisions of other laws and regulations.

Legal protection is an effort to keep and maintain public trust, especially customers, so it is appropriate for the banking world. Article 29 of Banking Law regulated coaching and supervision, which reads:

- a. Bank development and supervision are carried out by Bank Indonesia.
- b. Banks are required to maintain their health under the provisions on capital adequacy, asset quality, management quality, liquidity, profitability, solvency, and other aspects related to the bank's business, and are required to conduct business activities following prudential principles.
- c. In providing credit or financing based on Sharia Principles and conducting other business activities, banks are required to take methods that do not harm the bank and the interests of customers who entrust their funds to the bank.
- d. For the benefit of customers, banks are required to provide information regarding the possible risk of loss in connection with customer transactions conducted through the bank.
- e. The provisions that must be fulfilled by banks as referred to in paragraph (2), paragraph (3), and paragraph (4) shall be stipulated by Bank Indonesia.

In terms of legal protection for customers, the Indonesian banking system protects depositors in two ways, namely: Implicit deposit protection is protection generated by effective bank supervision and guidance, which can prevent bank bankruptcy. This protection is obtained through:

- a. Laws and regulations in the banking sector;
- b. The protection provided by effective supervisors and guidance, carried out by Bank Indonesia;
- c. Efforts to maintain the business continuity of banks as institutions in particular, and protection of the banking system in general;
- d. Maintain bank soundness level;
- e. Conducting business under the precautionary principle;
- f. How to provide credit that does not harm the bank and the interests of customers; and
- g. Provide risk information to customers.

The second is explicit deposit protection, namely protection through the establishment of an institution that guarantees public savings so that if a bank fails, the institution will replace public funds deposited in the failed bank. This protection is obtained through the establishment of an institution that guarantees public savings, as regulated in Presidential Decree No. 26 of 1998 concerning Guarantees Against the Obligations of Commercial Banks.¹⁶

¹⁴ Riadhi Tedi Putra, 'Bentuk Perlindungan Hukum Bagi Nasabah Terhadap Pembobolan Rekening Nasabah Oleh Pegawai Bank', *Jurnal Interpretasi Hukum*, 1.2 (2020), 181–185.p.183.

¹⁵ Dwi Edi Wibowo, 'How Consumers in Indonesia Are Protected Fairly? Analysis of Law No. 8 of 1999 Concerning Consumer Protection', *Indonesian Journal of Advocacy and Legal Services*, 2.1 (2020), 57–70.

¹⁶ Hermansyah, *Hukum Perbankan Nasional Indonesia* (Jakarta: Kencana Prenada Media Group, 2006).p.133.

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Banks must carry out business activities using the principle of prudence. According to the provisions of Article 2 of the Banking Law, it is stated that "Indonesian Banking in carrying out its business is based on Economic Democracy by using the principle of prudence." From the example of Bank Riau Kepri above, Riau Police arrested two former tellers of PT Bank Riau Kepri or BRK with the initials AS and NH, the alleged perpetrators of breaking into customer deposits here, the precautionary principle from the bank is no longer applied because in this principle bank employees have the duty to maintain and store customer funds so that customers feel trust and safe because they have saved and entrusted Bank Riau Kepri to their money, but the trust is misused. From this problem, the task of Bank Indonesia is to provide guidance and supervision to banks, this is a provision in the Banking Law that aims to protect the bank concerned and depositors of funds. The bank was administratively sanctioned under Article 52 of the Banking Law in the form of a written warning, and violations can be taken with the component of the bank, the bank may be granted even revoke their business licenses, and with the provisions of Article 49 paragraph (2) letter b Law Number 10 of 1998, the Board of Directors of the Bank concerned can be reported by the customer as having committed a criminal act and subject to criminal sanctions.¹⁷

The OJK Regulation (PJOK) also requires banks to compensate for losses suffered by customers. Article 29 PJOK Number 1/PJOK.07/2013 states "Financial Service Providers are required to be responsible for Consumer losses arising from errors and/or negligence, management, employees of Financial Services Business Actors and/or third parties who work for the interests of the Financial Services Providers. Compensation for customer losses who are victims of crime must be done by proving in advance whether the loss of customer funds is really due to skimming crimes or precisely because of the customer's negligence. Therefore, the bank that receives the report of the loss of customer funds will first investigate the transaction details of the lost customer's money. Legal protection to bank customers is set to POJK No. 18/POJK.07/2018 concerning Consumer Complaint Services in the Financial Services Sector, which explains, among other things, for Complaints that do not get a settlement solution in financial services businesses, in addition to being able to file a lawsuit through the courts, consumers can also settle disputes through Alternative Institutions. Implementation of the legal protection of customers who are disadvantaged about the law as a bank customer can be fought through the courts and out of court.¹⁸ The lawsuit to court as customers who feel aggrieved because of the savings in the form of deposits or savings banks lost due to stolen by bank employees would constitute a criminal offense of embezzlement of bank customer deposits. Lawsuits that can be pursued through the courts can be in the form of criminal charges or civil lawsuits. Embezzlement of bank customer deposits may be subject to Article 372 and Article 374 of the Criminal Code (KUHP).

CONCLUSION

Before the establishment of the OJK Law, banking was supervised and regulated by Bank Indonesia (BI). Regulations regarding the OJK are regulated in Law Number 21 of 2011 concerning the Financial Services Authority (*Otoritas Jasa Keuangan – OJK*) according to Article 1 number explaining that the OJK, is an institution that is independent and free from interference from other parties, which has the functions, duties, and authority for regulation, supervision, examination, and investigation. Regulatory and supervisory functions are not fully assigned to OJK, they continue to cooperate with BI and have their respective authorities in carrying out regulatory and supervisory functions. Regulation and Supervision of institutional, soundness, aspects of banking - prudential and bank examiners is the scope of microprudential the duties and authority of the OJK. As for the scope of microprudential regulation and supervision, OJK coordinates with BI to make moral appeals to banks.

The banking system in Indonesia to the protection of depositors, through two ways, namely: Protection implicitly (implicit deposit protection) and explicitly (explicit deposit protection). The OJK Regulation (PJOK) also requires banks to compensate for losses suffered by customers. Article 29 PJOK Number 1/PJOK.07/2013 states "OJK is required to be responsible for Consumer losses arising from errors and/or negligence, management, employees of Financial Services Business Actors and/or third parties who work for the interests of the Financial Services Providers. Compensation for customer losses who are victims of crime must be done by proving in advance whether the loss of customer funds is really due to the bank's crime or precisely because of the customer's negligence. The legal protection to bank customers is set to POJK No. 18/POJK.07/2018 concerning Consumer Complaint Services in the Financial Services Sector. The implementation of the legal protection of consumers (customers) who are disadvantaged about the law as a bank customers, can be fought through the courts and out of court. Lawsuits that can be pursued through the courts can be in the form of criminal charges or civil lawsuits. Embezzlement of bank customer deposits may be subject to Article 372 and Article 374 of the Criminal Code (KUHP).

¹⁷ M. Sampul, 'Tanggung Jawab Bank Terhadap Hak Yang Dirugikan Dalam Pembobolan Rekening Nasabah Menurut Undang-Undang Nomor 10 Tahun 1998 Tentang Perbankan', *Lex Crimen*, 5.7 (2016), 125–132.p.127.

¹⁸ Marwan Effendy, *Tipologi Kejahatan Perbankan Dari Perspektif Hukum Pidana* (Jakarta: Referensi, 2012).p.12.

REFERENCES

1. Alboukrek, Karen, 'Adapting to A New World of E-Commerce: The Need for Uniform Consumer Protection in the International Electronic Marketplace', *George Washington International Law Review*, 35.2 (2003), 420–31
2. Andryanto, S. Dian, '6 Kasus Pembobolan Rekening Nasabah Bank Sepanjang 2021, Jebol Miliaran Rupiah', *Tempo.Co*, 2021 <<https://bisnis.tempo.co/read/1448803/6-kasus-pembobolan-rekening-nasabah-bank-sepanjang-2021-jebol-miliaran-rupiah/full&view=ok> > [accessed 20 July 2021]
3. Antonio, Muhammad Syafi'i, *Bank Syariah: Dari Teori Ke Praktik* (Jakarta: Gema Insani Press, 2017)
4. Dwi Edi Wibowo, 'How Consumers in Indonesia Are Protected Fairly? Analysis of Law No. 8 of 1999 Concerning Consumer Protection', *Indonesian Journal of Advocacy and Legal Services*, 2.1 (2020), 57–70
5. Effendy, Marwan, *Tipologi Kejahatan Perbankan Dari Perspektif Hukum Pidana* (Jakarta: Referensi, 2012)
6. Hasanah, Uswatun, *Hukum Perbankan* (Malang: Setara Press, 2017)
7. Hermansyah, *Hukum Perbankan Nasional Indonesia* (Jakarta: Kencana Prenada Media Group, 2006)
8. Margareta Waworuntu, Tri Oldy Rotinsulu, Dennij Mandeij, 'Peran Sektor Perbankan Dalam Mengembangkan Daya Saing Usaha Mikro Kecil Dan Menengah (UMKM) Indonesia Memasuki Pasar MEA 2010-2015', *Jurnal Berkala Ilmiah Efisiensi*, 17.1 (2017), 183–93
9. Nun Harrieti, 'Kewenangan Bank Indonesia Dan Otoritas Jasa Keuangan Pasca Berlakunya POJK Nomor 1/POJK. 07/2013 Dan POJK Nomor 1/POJK. 07/2014 Terhadap Penyelesaian Sengketa Nasabah Di Indonesia', *Jurnal Ilmiah Hukum DE'JURE: Kajian Ilmiah Hukum*, 1.2 (2016), 329–43
10. Pamuji, Reza Aditya, 'Perlindungan Hukum Bagi Nasabah Dan Tanggung Jawab Bank Dalam Kasus Card Skimming', *Jurnal Lex Renaissance*, 3.1 (2018), 25–43
11. Putra, Riadhi Tedi, 'Bentuk Perlindungan Hukum Bagi Nasabah Terhadap Pembobolan Rekening Nasabah Oleh Pegawai Bank', *Jurnal Interpretasi Hukum*, 1.2 (2020), 181–85
12. Sampul, M., 'Tanggung Jawab Bank Terhadap Hak Yang Dirugikan Dalam Pembobolan Rekening Nasabah Menurut Undang-Undang Nomor 10 Tahun 1998 Tentang Perbankan', *Lex Crimen*, 5.7 (2016), 125–32
13. Suherman, 'Upaya Mediasi Dalam Penyelesaian Sengketa Di Lembaga Perbankan', *ADHAPER: Jurnal Hukum Acara Perdata*, 4.1 (2018), 109–22
14. Sulistyandari, 'Lembaga Dan Fungsi Pengawasan Perbankan Di Indonesia', *Mimbar Hukum*, 24.2 (2012), 226–40
15. Thomas, Kristie, 'Law, Analysing the Notion of "Consumer" in China's Consumer Protection', *The Chinese Journal of Comparative Law*, 6.2 (2018), 294–318
16. Wafiyah, 'Perlindungan Hukum Bagi Nasabah Yang Mengalami Kerugian Dalam Transaksi Perbankan Melalui Internet', *Jurnal Ilmu Hukum Kanun*, 56.14 (2012), 37–52
17. Yustianti, Surti, 'Kewenangan Pengaturan Dan Pengawasan Perbankan Oleh Bank Indonesia Dan Otoritas Jasa Keuangan (OJK)', *ACTA DIURNAL Jurnal Ilmu Hukum Kenotariatan*, 1.1 (2017), 60–72
18. Zulfi Diane Zaini, 'Peralihan Fungsi Pengawasan Lembaga Perbankan Dari Bank Indonesia Ke Otoritas Jasa Keuangan', *Pranata Hukum*, 9.1 (2014), 1–14