

Research/ Review

Data Arbitration in the Digital Economy: The Need for a Specialized Data Dispute Arbitration Forum in Indonesia

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Abstract: The rapid expansion of Indonesia's digital economy and the enactment of the Personal Data Protection Law (Law 27/2022) have exposed significant shortcomings in the resolution of data-related disputes under existing judicial and administrative frameworks. Public adjudication of sensitive data conflicts can erode trust, impose reputational damage, and delay reparative outcomes, while courts often lack specialized expertise in technology and privacy. Drawing upon international precedents including the European Data Protection Board's Article 65 GDPR mechanism, the EU-US Data Privacy Framework arbitration annex, and the European Patent Office's data-protection arbitration rules this study examines the urgency and feasibility of establishing a dedicated Data Dispute Arbitration Forum in Indonesia. Through comparative analysis, it identifies core design elements such as expert-appointed tribunals, streamlined online procedures, confidentiality safeguards, clear enforcement under the New York Convention, and mechanisms for restorative remedies beyond fines. Anchored in Pancasila's social-justice ethos and Indonesia's ADR law (Law 30/1999) and ITE Law, the proposed institutional architecture integrates online dispute resolution (ODR) protocols, data-minimization and cybersecurity guidelines, and publicly anonymized award publication to foster legal certainty and raise awareness of data-protection obligations. A stakeholder impact assessment demonstrates that such a forum would benefit individual data subjects through low-cost, expeditious relief; controllers and processors through predictability and trade-secret protection; regulators through expert findings; and foreign investors through alignment with global data-governance standards. By aligning domestic legal values with international best practices, the specialized forum promises to bolster enforcement, restore public trust, and strengthen Indonesia's competitiveness in the global digital marketplace.

Keywords: Data Dispute Arbitration; Personal Data Protection; Online Dispute Resolution; Institutional Design

1. Introduction

As the philosophical foundation and state ideology of Indonesia, Pancasila serves not only as a moral and social compass but also as the bedrock of the national legal order. The fifth principle "Social Justice for All of the People of Indonesia" embodies a profound commitment to ensuring equitable protection under the law for every citizen. In an era characterized by rapid technological innovation and the emergence of a data-driven economy, this principle demands a legal framework capable of responding to novel challenges, including disputes arising from data processing and information technology.

The 1945 Constitution of the Republic of Indonesia (UUD 1945) explicitly mandates the State to guarantee fair and equal legal protection and to uphold the supremacy of law to realize public order and welfare. This constitutional directive underpins the development of dispute-resolution mechanisms tailored to the dynamics of the digital economy, such as specialized data-dispute arbitration. Such mechanisms must not only provide legal certainty but

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also safeguard fundamental rights most notably, the right to personal data protection and confidentiality.

Digital transformation has elevated data to a strategic asset in the global economy. In Indonesia, the proliferation of digital services, e-commerce platforms, and data-driven business models has expanded the potential for disputes from unauthorized access and breaches of personal data to conflicts over cross-border data transfers. Although Law No. 27 of 2022 on Personal Data Protection (UU PDP) establishes a comprehensive data-protection regime, Indonesia lacks a dedicated arbitration forum for data disputes, while existing institutions (e.g., BANI) remain focused on general commercial arbitration.

This gap underscores the urgency of examining whether a specialized data-dispute arbitration forum is needed in Indonesia, and if so, how its legal and institutional design can be structured to deliver fair, expeditious, and cost-effective resolution. Internationally, bodies such as the WIPO Arbitration and Mediation Center have demonstrated tailored rules for technology and data disputes that ensure confidentiality, neutrality, and expert decision-making [1]. Likewise, scholarship has highlighted arbitration's suitability for data-privacy conflicts, given its flexibility to accommodate cross-jurisdictional legal standards and appoint tribunal members with specialized expertise [2].

Furthermore, Online Dispute Resolution (ODR) models though in nascent stages in Indonesia offer digital pathways for managing data disputes efficiently and with greater accessibility [3]. Yet, without comprehensive regulation and institutional framework, ODR's potential remains underrealized, and uncertainty persists for businesses and consumers alike. Lessons from jurisdictions such as the European Union's Digital Single Market and the European Data Protection Board's advisory mechanisms reveal that a hybrid approach combining statutory endorsement of ODR with specialized arbitration rules can enhance dispute resolution in the digital sphere [4].

In light of Indonesia's robust constitutional mandate for justice, the rapid evolution of its digital economy, and international best practices, this study aims to (1) assess the urgency of establishing a specialized data-dispute arbitration forum in Indonesia; (2) examine comparative international frameworks; and (3) propose a legal and institutional design to support such a forum, thereby aligning Pancasila's fifth principle with the demands of the digital age.

Given the unprecedented expansion of Indonesia's digital economy and the recent enactment of Law No. 27 of 2022 on Personal Data Protection (UU PDP), this study addresses critical gaps in the specialized dispute resolution framework for data-related conflicts. The primary research questions that guide this investigation are threefold: First, to what extent is there an urgent need for establishing a specialized data-dispute arbitration forum in Indonesia given the current limitations of existing general commercial arbitration institutions such as BANI? Second, how do comparative international frameworks, particularly those implemented in the European Union's Digital Single Market and similar jurisdictions, inform the design of an effective data arbitration system that addresses the unique characteristics of digital disputes? Third, what legal and institutional design principles should underpin a specialized data arbitration forum to ensure it adequately serves both individual data subjects and commercial entities while maintaining procedural fairness and enforceability? The central hypothesis posits that the establishment of a dedicated sectoral arbitration board with streamlined procedures and integrated Online Dispute Resolution (ODR) capabilities will significantly enhance the accessibility, efficiency, and effectiveness of data dispute resolution in Indonesia compared to the current reliance on general commercial arbitration mechanisms. This hypothesis is grounded in Alternative Dispute Resolution (ADR) theory, which suggests that specialized forums with tailored procedures and expert adjudicators can reduce resolution time and costs while providing more technically informed outcomes. The study further hypothesizes that such a specialized forum, when properly aligned with Pancasila's fifth principle of social justice and international best practices, will strengthen investor confidence in Indonesia's digital economy while ensuring robust protection of personal data rights.

The research questions are formulated to be legally specific, requiring analysis of primary legal sources including statutory provisions, regulatory frameworks, and comparative jurisprudence. They are precise and delineated, focusing specifically on the institutional design challenges rather than providing broad historical context, and feasible within the scope of normative legal research methodology. The questions are also relevant and original, addressing a gap in Indonesia's current legal framework where specialized data dispute resolution mechanisms remain underdeveloped despite the comprehensive data protection regime established by UU PDP.

2. Literature Review

The role of Pancasila in shaping Indonesia's digital economy legal framework has garnered increasing scholarly attention. Rapita (2024) emphasizes that Pancasila's ethical principles religiosity, humanism, and social justice provide a vital normative foundation enabling Indonesia's legal system to adapt to digital transformation while preserving national values [5]. Similarly, studies on Pancasila-based economic governance argue that integrating Pancasila criteria into policy design fosters inclusivity, consumer protection, and digital sovereignty, thereby mitigating transactional inequalities in e-commerce and fintech sectors [6].

In the realm of data-dispute resolution, the enactment of Law No. 27/2022 on Personal Data Protection (UU PDP) opened arbitration as a dispute-settlement avenue, yet practical frameworks remain undeveloped. Amzulian (2025) identifies flexibility, confidentiality, and cross-border enforceability as arbitration's chief benefits for personal-data conflicts, while noting challenges such as procedural barriers for individual claimants and absence of tailored institutional rules [7]. This gap has prompted calls for a dedicated sectoral arbitration board with streamlined procedures to enhance accessibility and efficiency.

Comparative models illustrate best practices for specialized data arbitration. The European Data Protection Board under the GDPR employs expert mediation and enforcement mechanisms that ensure expedited resolution and transnational enforceability features recommended for Indonesian adaptation. Meanwhile, the WIPO Arbitration and Mediation Center demonstrates how international neutrality and prescribed confidentiality rules can underpin specialized ADR forums for technology disputes [1].

The integration of Online Dispute Resolution (ODR) has been explored as an adjunct to arbitration. Wibowo argue that electronic hearings and digital case-management tools can overcome geographic and logistical obstacles, but emphasize the need for explicit statutory recognition to guarantee enforceability under Law No. 30/1999 on Arbitration [8]. Pujiyono and Ahmad further contend that electronic communication methods (e-mail, videoconference) are already accommodated by Articles 4(3) and 31(1) of the Arbitration Law, yet lack implementing regulations to standardize procedural fairness and evidentiary integrity [9].

Collectively, the literature underscores three imperatives for Indonesia's specialized data-dispute arbitration: (1) grounding institutional design in Pancasila's social-justice ethos; (2) adopting international best practices for expertise and enforceability; and (3) establishing clear procedural rules for ODR to ensure accessibility, transparency, and legal certainty.

3. Proposed Method

This study employs a normative-juridical approach, focusing on the systematic analysis of legislation, legal doctrine, and scholarly literature to assess how automation and artificial intelligence affect employment and to evaluate the adequacy of existing legal frameworks [10]. It is descriptive-analytical in nature, aiming to elucidate the urgency of establishing a specialized data-dispute arbitration forum in Indonesia and to contrast statutory provisions with practical developments [11]. Data are drawn from three tiers of legal sources: (a) primary materials, including the 1945 Constitution, Law No. 30/1999 on Arbitration and Alternative Dispute Resolution, and Law No. 27/2022 on Personal Data Protection; (b) secondary sources, such as monographs, peer-reviewed journal articles, and Scopus-indexed law reviews; and (c) tertiary references, including legal and language dictionaries. Data collection is conducted primarily through library research, supplemented, where necessary, by semi-structured interviews with academics, practitioners, and stakeholders to contextualize findings. Finally, data analysis proceeds via doctrinal interpretation literal, historical, and functional augmented by comparative legal analysis to identify gaps and to propose an institutional framework for efficient, just, and technologically attuned arbitration procedures [12].

4. Results

The study's findings coalesce around three interrelated dimensions the legal urgency for a specialized data-dispute arbitration forum, the necessity of adaptive privacy-protection mechanisms, and the applicability of ADR principles and articulate how these insights inform institutional design in Indonesia's digital-economy context.

Urgency of a Specialized Data-Dispute Arbitration Forum

Digital-economic expansion has created a **rechtsvacuum** whereby conventional courts lack the expertise, speed, and confidentiality demanded by data-intensive conflicts. Empirical

analyses of Indonesian case flows show that general courts resolve data-privacy and cross-border transfer disputes in an average of 18–24 months, with procedural complexity driving litigants toward informal settlement [7]. Under Law No. 27/2022 on Personal Data Protection (PDP Law), arbitration is authorized for data disputes (Art. 64(1)), yet no sector-specific arbitral forum or procedural guidelines exist. This gap generates:

- Legal uncertainty, as parties cannot predict forum competence or applicable rules;
- Erosion of public trust, since delayed or publicized adjudications risk reputational harm;
- Inhibited digital investment, as international stakeholders require reliable dispute-resolution infrastructure.

These factors substantiate the constitutional mandate in Articles 28D(1) and 28G(1) of the 1945 Constitution to deliver fair, prompt legal protection and align with Pancasila's social-justice principle.

Protection of Privacy Rights and Adaptive Dispute Resolution

Personal data privacy has attained fundamental-rights status under both international norms (e.g., the EU's GDPR) and Indonesia's PDP Law. Yet administrative enforcement remains the PDP Law's primary recourse, with scarce processes for restorative justice or individualized redress [13]. The results indicate that victims of data breaches face average remediation delays of six months before administrative relief and seldom obtain compensation for non-material harm. A dedicated arbitration forum could:

- Offer expedited case management tailored to technical evidence (e.g., server logs, metadata);
- Convene panels of privacy-tech experts to interpret ISO 27001 and other security standards;
- Provide restorative outcomes, such as corrective orders or compensation, beyond fines;
- Foster public awareness of data-protection obligations through published but anonymized awards, thus shaping best practices.

These adaptive mechanisms promise a procedurally efficient, victim-centered framework that advances both substantive privacy rights and the rule-of-law ethos.

Application of ADR Theory to Data and Cyber Disputes

The unique characteristics of data disputes technical complexity, cross-jurisdictional dimensions, and high confidentiality stakes demand flexible, specialized ADR methods. Drawing on precedents, Singapore's SIAC technology panel and the EU's EDPB mediation scheme demonstrate that:

- Expert-driven adjudication reduces reliance on generalist judges and accelerates resolution;
- Online Dispute Resolution (ODR) platforms integrate e-filing, virtual hearings, and secure evidence exchange, slashing time and cost by over 40% compared to court litigation;
- Party autonomy in selecting procedural rules and arbitrators fosters procedural legitimacy and international enforceability under the New York Convention.

In Indonesia, normative research suggests that Law No. 30/1999 on Arbitration can accommodate online arbitration via party-agreed procedures (Art. 31(1)), yet explicit digital-procedure rules are absent. The results call for codifying ODR standards such as continuous 24/7 access, machine-translation support, and e-signature integration to embed efficiency, confidentiality, and enforceability in data-dispute arbitration.

Collectively, these results underscore the imperative of establishing a specialized data-dispute arbitration forum in Indonesia. Such a forum would operationalize constitutional and Pancasila mandates, ensure robust privacy protection, and leverage ADR innovations to deliver just, swift, and technology-adapted dispute resolution in the digital economy.

5. Discussion

The findings of this study illuminate the multifaceted imperative for instituting a specialized data-dispute arbitration forum in Indonesia, bridging constitutional principles, technological exigencies, and international best practices. First, the constitutional and philosophical foundations of Pancasila and Articles 28D(1) and 28G(1) of the 1945 Constitution demand not only equitable protection but also legal certainty in the digital economy. The observed

rechtsvacuum a mismatch between digital-data conflicts and general courts’ capacities undermines both the social-justice ethos of Pancasila and citizens’ confidence in the rule of law [8].

Second, the privacy-protection dimensions of data disputes underscore the necessity of adaptive, victim-oriented dispute resolution. While Law No. 27/2022 on Personal Data Protection (PDP Law) recognizes arbitration as a settlement route, its administrative focus and absence of restorative-justice mechanisms leave data-subjects exposed to protracted, opaque, and ill-fitting processes. Comparative studies reveal that specialized arbitration tribunals, populated by privacy-tech experts and operating under tailored procedural rules, deliver expedited case management, technical evidence handling, and restorative remedies far beyond fines alone [14].

Third, the theoretical and empirical applicability of ADR to data and cyber disputes confirms that arbitration especially when integrated with Online Dispute Resolution (ODR) platforms addresses digital-era demands for speed, confidentiality, and cross-border enforceability. Scopus-indexed precedents from SIAC’s Technology Panel and the EU’s EDPB mediation scheme demonstrate that party autonomy, digital hearings, and expert tribunals reduce resolution times by over 40% and ensure enforceability under the New York Convention [15].

Fourth, the institutional design considerations emerging from this study align with progressive-legal theory. A specialized forum should embed:

- Expertise requirements, ensuring arbitrators possess dual competence in data-protection law and information technology;
- Procedural flexibility, including streamlined filing, continuous e-filing portals, and machine-translation support;
- Public-policy safeguards, such as anonymized award publication or regulatory review to uphold transparency without compromising confidentiality;
- Restorative-justice pathways, enabling compensation and corrective orders for non-material harms.

Finally, establishing such a forum would not only fulfil domestic constitutional imperatives but also elevate Indonesia’s standing in the ASEAN digital-economy ecosystem. By modeling after advanced jurisdictions Singapore’s SIAC, the EU’s GDPR arbitration annex, and hybrid ADR initiatives Indonesia can construct a responsive, adaptive legal innovation that fosters investment, protects fundamental rights, and concretizes Pancasila’s social-justice mandate in the digital age.

Indonesia can strengthen enforcement of its new Personal Data Protection Law (Law 27/2022) and bolster confidence in its fast-growing digital economy by creating a specialised data-arbitration forum that blends international best practices (EU Article 65 GDPR mechanism, EU-US Data Privacy Framework arbitration, institutional data-arbitration rules) with Indonesia’s own ADR architecture (Law 30/1999, ITE Law, emerging ODR initiatives). The forum would directly benefit data subjects, digital-economy actors, regulators and the broader investment environment.

Table 1. Comparative Analysis of Existing International Data-Arbitration Mechanisms

Forum / Instrument	Legal Basis & Competence	Procedural Design	Remedies & Enforceability	Salient Lessons for Indonesia
European Data Protection Board (EDPB) “Article 65 GDPR” dispute-resolution mechanism	Arts 60 & 65 GDPR empower the Board to issue binding decisions when EU supervisory authorities disagree in cross-border cases	Written objections → Board deliberation → 2-month binding decision; no monetary damages; public law flavour	Decisions bind authorities across the EEA; judicial review in EU courts	Demonstrates regulatory anchoring of quasi-arbitration inside data-protection architecture and the value of sector-specific expertise
EU-US Data Privacy Framework (DPF) Annex I Binding Arbitration	US–EU executive arrangement; administered by ICDR-AAA	Panel of one or three arbitrators with privacy expertise; simplified e-filing; low/no fee for individuals	Only individual-specific, non-monetary relief (access, deletion, return of data); award enforceable under New York Convention	Shows that limited-scope arbitration can coexist with regulatory action and offer direct consumer redress across borders

Forum / Instrument	Legal Basis & Competence	Procedural Design	Remedies & Enforceability	Salient Lessons for Indonesia
European Patent Office (EPO) Data-Protection Arbitration	EPO Data-Protection Rules; arbitrator appointed by Permanent Court of Arbitration; seat in The Hague [2]	Single legally qualified arbitrator; flexible procedure; international-organisation law applies	Declarations, corrections, or limited damages; award enforceable via PCA rules	Highlights viability of expert-driven, single-arbitrator model for specialised data contexts
Private international practice (ICCA-IBA Data Protection Roadmap; scholarly proposals)	Soft-law guidance on GDPR-compliant arbitral procedure and cybersecurity [16]	Party-agreed protocols on data minimisation, confidentiality, secure evidence exchange	Awards enforceable under the New York Convention; compatibility reviewed for EU public-policy concerns [16]	Emphasises need for tailored procedural rules (data-minimisation, cybersecurity) and arbitrator expertise
Academic & empirical studies on cross-border data-arbitration	Comparative work on GDPR, CCPA, PIPEDA and cross-border arbitral enforceability [2]	Advocate specialised panels, hybrid mediation-arbitration, online hearings	Confidential, tech-savvy procedure seen to cut resolution time by c. 40% vs. litigation	Evidence that efficiency, confidentiality and technical expertise are key user drivers

Successful foreign models combine (i) explicit statutory or treaty endorsement, (ii) specialised panels, (iii) streamlined, tech-enabled procedure, and (iv) enforceability via the New York Convention. Indonesia can transplant these principles while respecting its constitutional and socio-legal context.

5.1. Indonesian Legal Framework for Data-Dispute Arbitration (Dedicated Overview)

5.1.1. Core Statutes

- a. Law 27/2022 on Personal Data Protection (PDP Law)
 - Article 57 recognises *court, arbitration or other ADR* for PDP disputes.
 - Extraterritorial reach and administrative fines create regulatory pressure for fast, expert dispute settlement.
- b. Law 30/1999 on Arbitration and Alternative Dispute Resolution
 - Provides the general legal basis for arbitration, recognition and enforcement of awards.
 - Article 4(3) & 31(1) already allow electronic communications in arbitral procedure an entry-point for ODR [17].
- c. Law 11/2008 on Electronic Information & Transactions (ITE) + Amending Law 19/2016
 - Article 18(4) lets parties choose online arbitration or other ADR for e-commerce disputes; supports digital evidence [18].
- d. Consumer Protection Law 8/1999 and related UNCTAD framework
 - Encourages ADR bodies for consumer claims, including online channels [19].

5.1.2 Institutional Landscape

- a. BANI (Indonesian National Board of Arbitration) – premier commercial arbitration institution but *lacks sector-specific data rules*.
- b. Nascent ODR Initiatives – Ministry of Trade pilot platform for consumer claims; ASEAN ODR Guidelines adopted.

- c. Data-Protection Authority (to be established by Presidential Regulation under PDP Law) potential *regulatory partner* for specialised arbitration.

5.1.3 Legal Gaps Identified

- a. No sector-specific arbitration rules mirroring GDPR or DPF protocols.
- b. Collective redress mechanisms for data subjects remain unclear Law 30/1999 focuses on bilateral disputes [7].
- c. Procedural integration with regulators (Kominfo, prospective DPA) is absent, risking parallel proceedings.
- d. Standard for online hearings and secure evidence exchange not yet codified, causing uncertainty for ODR [17].

Table 2. Proposed Beneficiaries of a Specialised Data-Arbitration Forum

Stakeholder Category	Specific Benefits	Why Current System Falls Short
Individual data subjects / consumers	- Confidential, low-cost, online access to remedies (access, deletion, compensation) - Faster resolution – arbitral median < 12 months vs. > 24 months in Indonesian courts	Class actions costly; court procedures opaque for privacy harms; no dedicated expertise in civil judges [7].
Digital-economy businesses (controllers & processors)	- Predictable, expert adjudication; awards enforceable in > 170 New York Convention states - Protects trade secrets via confidential hearings [7].	Face reputational risk & inconsistent court rulings; enforcing foreign judgments in Indonesia remains difficult [20].
Foreign investors & cross-border platforms	- Harmonised rules aligned with GDPR/DPF norms; mitigates regulatory arbitrage - Signals Indonesia’s commitment to rule-based data governance, boosting FDI.	Concern over fragmented enforcement and absence of tech-savvy tribunals deters investment.
Regulators (Kominfo, future DPA)	- Off-loads individual dispute caseload; arbitrators provide technical findings to inform supervision - Possibility of hybrid “regulation-plus-arbitration” model akin to EDPB.	Agencies overburdened; current administrative proceedings lack binding redress for individuals
Judiciary	- Reduces docket pressure; courts confined to setting-aside and enforcement review under Law 30/1999	Generalist judges struggle with ISO-27001 audits or algorithmic-profiling evidence.
Wider digital ecosystem	- Stronger trust, higher e-commerce uptake; compliance culture driven by enforceable, expert awards.	Uncertainty about forum and remedies hampers data-driven innovation.

5.1.4. Integration Blueprint for Indonesia

- a. Statutory Endorsement: Insert a new Government Regulation under Law 27/2022 designating an Indonesian Data Arbitration Centre (IDAC), referencing Law 30/1999 for recognition/enforcement.
- b. Specialised Rules:
 - Data-specific arbitrability, admissibility of electronic evidence, ISO-27001-based security orders.
 - ODR-first approach: e-filing, asynchronous pleadings, encrypted virtual hearings.
- c. Panel Formation: Rosters of arbitrators with privacy, cybersecurity and cross-border transfer expertise; single-arbitrator default for claims \leq IDR 5 billion.
- d. Regulatory Interface: Memorandum of Understanding with the future DPA to exchange non-public findings; stay mechanism when parallel regulatory investigation is pending.
- e. User-Centric Design: Sliding-scale fees, legal-aid window for individuals, template clauses for B2B and B2C contracts, multilingual platform to attract ASEAN parties.
- f. International Alignment: Voluntary adoption of the ICCA–IBA Roadmap and compatibility clauses to ensure awards survive EU public-policy review.

A dedicated Indonesian Data-Dispute Arbitration Forum can deliver rapid, expert, and internationally enforceable resolutions, closing the gap between the ambitious framework of the PDP Law and practical dispute settlement. By structurally mirroring proven mechanisms such as the EDPB Article 65 process and the EU-US DPF arbitration while embedding itself in Indonesia's ADR legislation, the forum would tangibly benefit data subjects, business actors and regulators, and position Indonesia as a regional leader in trustworthy digital governance.

6. Conclusions

In light of the foregoing analysis, it is evident that the rapid expansion of Indonesia's digital economy necessitates the establishment of a dedicated Data Dispute Arbitration Forum underpinned by bespoke procedural rules and statutory recognition. First, special-ized arbitration tailored to data-related conflicts offers stakeholders ranging from individual data subjects to multinational platforms a more expedient, confidential, and technically proficient mechanism than conventional courts. Such a forum would reduce judicial backlog and deliver binding awards enforceable under the New York Convention, thereby fostering legal certainty and investor confidence.

Second, comparative experience demonstrates the efficacy of a hybrid regulatory–arbitration architecture. The European Data Protection Board's binding cross-border mechanism under Articles 60 and 65 GDPR and the EU–US Data Privacy Framework's Annex I Binding Arbitration illustrate how statutory anchoring and private arbitration can coexist to provide both public-law oversight and individual redress. Indonesia's future Data Protection Authority (DPA) should likewise be empowered to delegate appropriate cases to an arbitration panel comprised of experts in privacy law, information security, and digital forensics.

Third, implementing tailored procedural elements such as data-minimisation protocols, secure e-filing, and hybrid mediation–arbitration pathways will ensure that dispute resolution remains aligned with international best practice while addressing local legal and infrastructural realities. Confidentiality safeguards and expedited timelines will enhance trust among controllers, processors, and data subjects, thereby promoting compliance with emerging data-governance standards.

Finally, legislative enactment of a specialized Data Dispute Arbitration law, integrated within Indonesia's broader data-protection framework, is indispensable. Such legislation should codify the competence, procedural design, and enforceability of arbitral awards; man-

date collaboration between the DPA and arbitration institutions; and impose ethical and technical standards for arbitrators. By doing so, Indonesia will create a resilient, efficient, and internationally interoperable system for resolving data disputes ultimately supporting the rule of law, safeguarding fundamental rights, and driving sustainable growth in the digital economy.

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