

INDONESIAN OMNICHANNEL BANKING: HOW FAR DO GOVERNING LAWS PROTECT CUSTOMER'S DATA PRIVACY

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Abstract

In the digital transformation era, banks have been working to implement a digital strategy that will lead to lower costs, better service, higher profitability, and the desired level of customer satisfaction. Utilising marketing technology for consumer engagement is essential to bringing in more customers without increasing costs. Omnichannel is the marketing strategy that offers more services to customers by having them interact with it across all available physical and digital channels at any time, resulting in higher customer satisfaction and loyalty. Customer data is significant information that may be used at any stage of the digital marketing process. The Protection of Personal Data Act of 2022 and the Act of Development and Strengthening of the Financial Sector of 2023 govern consumer data protection at all stages of marketing activities, including data processing, profiling, and collaboration with other organisations. This study reviews how far the governing laws can protect consumer private data in utilisation in the company's digital marketing program to boost utilisation of the company's omnichannel approach. The study discovered that governing laws can protect the customer's private data in the banking omnichannel approach. Customer data are governed clearly and strongly by the regulations at all marketing program phases that could potentially be exploited, so both laws will be able to prevent illegal activities of customer data

optimally in the future. Lastly, customer approval is critical for the Bank's use of all customer data.

Keywords: Customer; Digital; Omnichannel; Personal; Protection.

Introduction

Most banks today try to develop and enhance their digital products in the digital age by utilising all available sales channels. The objective of the process of digital transformation is to maximise the benefits of digital technology, such as improved efficiency, reduced expenses (i.e., fewer physical engagements with the consumer), and innovation¹. As Son et al state, digital technology has significantly changed the conventional financial services industry business structure, which has also affected the banking sector's fundamentals.²

The Protection of Personal Data Law Number 15, the year 2022 (hereinafter named PDP Law) and, recently, the Law of Development and Strengthening of The Financial Sector Number 4 the year 2023 number 4, Article 7, paragraph (3) includes the following statements, the requirement to protect personal data when processing personal data, the owner's legal permission for the Customer's stated purpose and deletion and/or termination of personal data and transaction processing, and/or withdrawal of the Consumer's consent. Moreover, the PDP Law Number 15, 2022, is stated in more detail and comprehensively. As Saeed states, customers' perceptions of security and privacy may be impacted by variations in the financial system, the legal system, and consumer sensitivity to security.³

According to Article 5 of the PDP Law, individuals who are subjects of personal data have a right to know about the name of the person requesting the data (i.e., specific or general data), the legal grounds for that request, the intended use of the data, and the party's accountability.

¹ Thomas Hess et al., "Options for Formulating a Digital Transformation Strategy," *MIS Quarterly Executive* 15, no. 2 (2020): 151–173, p. 124

² Yoonseock Son et al., "Impact of Customers' Digital Banking Adoption on Hidden Defection: A Combined Analytical–Empirical Approach," *Journal of Operations Management* 66, no. 4 (2020): 418–440.

³ Saqib Saeed, "A Customer-Centric View of E-Commerce Security and Privacy," *Applied Sciences* 13, no. 2 (2023): 1020.

On the one hand, the corporation emphasises its online marketing approach by using multiple marketing channels, such as online advertisements, online banking, and mobile marketing, to attract interested customers and offer the bank's services⁴ and the other hand, factors influencing purchase intention include security, privacy, and usability.⁵ As stated in Article 3 of Law No. 4 of 2023, the development and strengthening of the financial sector was issued to encourage the financial sector's contribution to inclusive, fair, sustainable economic growth. This includes enhancing the protection of customers' personal data.

New business models that support digital transformation are replacing conventional methods as they lose competitiveness⁶ and online marketers are being encouraged to use online media for marketing reasons due to the rise of technological online media and the advancement of online technology. Digital marketing is growing as a result and has become the newest marketing trend.

Today's shoppers who approach their buying process from a multi-channel perspective refer to themselves as omnichannel, combining both physical and digital channels in the expectation of having a seamless experience.⁷ The multichannel customer evolved into the omnichannel user by switching from using a small number of channels concurrently to using every channel at the same time.⁸

One of the Bank's marketing strategies for improving marketing digital activities is omnichannel banking, which provides consumers access to banking products and services through multiple channels and enables greater consistency in dealings with the bank. In this method, a consumer may, for example, apply over the telephone for a home

⁴ Kumud Ch Goswami and Sanjay Sinha, "Cashless Economy and Strategic Impact on Bank Marketing," *SUMEDHA-Journal of Management* 8, no. 1 (2019): 131–142.

⁵ Saeed, "A Customer-Centric View of E-Commerce Security and Privacy."

⁶ Marko Slavković et al., "Impact of Digital Capabilities on Digital Transformation: The Mediating Role of Digital Citizenship," *Systems* 11, no. 4 (2023): 172.

⁷ Paula Rodríguez-Torrío, Sonia San-Martín, and Rebeca San José Cabezedo, "The Role of Omnichannel Tendency in Digital Information Processing," *Online Information Review* 44, no. 7 (October 2020): 1347–1367, <https://www.emerald.com/insight/content/doi/10.1108/OIR-08-2019-0272/full/html>.

⁸ Rodr and San-mart

mortgage, and the bank could thereafter send him offers for targeted refinancing or home equity lines via email or the consumer's website.⁹ In short, a seamless user experience is delivered through omnichannel and integrated through all channels.

According to The PDP Law Law Number 15, the year 2022, and, recently, the Law of Development and Strengthening of The Financial Sector Number 4, the year 2023, Number 4, Article 7, Paragraph (3), it can be demonstrated that the critical research of the Businesses in the financial sector must comply with the three indicated criteria. The area of customer written consent for the consumer, first, processing and profiling; second, marketing program partnerships with third parties. Customer privacy data will be the primary focus of the researcher, while, in practice (i.e., the researchers as customers of many banks), the researchers have never experienced what was written and elaborated in both acts.

A study by Beck and Rygl indicates omnichannel retailing is the most modern technological innovation in retail services.¹⁰ and also supported by Bell et al., omnichannel techniques use digital touchpoints and channels to synchronise different customer interests through the entire process of buying.¹¹

Studies have shown that omnichannel approaches improve the range of service outputs offered to the client, boosting client satisfaction and, ultimately, client loyalty.¹² Furthermore, there may be challenges and opportunities for intense rivalry among banks in attracting as many potential customers as possible throughout the digitalization transition process. Potential challenges include the customer profiling process, approval of customer data as part of the omnichannel process, and collaboration with other third parties. BRI and BCA are examples of state-owned businesses and private national banks demonstrating

⁹ “Omnichannel : More Than a Buzzword for Banks Table of Contents,” 2017.

¹⁰ Federico Artusi and Emilio Bellini, “The Interplay between Product and Retail Service Meaning,” *International Journal of Retail & Distribution Management* 49, no. 1 (2020): 105–120.

¹¹ Artusi and Bellini

¹² Marcel Weber and Christos G. Chatzopoulos, “Digital Customer Experience: The Risk of Ignoring the Non-Digital Experience,” *International Journal of Industrial Engineering and Management* 10, no. 3 (2019): 201–210.

technological innovation in service to their clients by optimising their digital channels.

This study applies a normative juridical method, and exploratory research is used to study research questions as well as novel challenges that have yet to be investigated.¹³ The data collecting method, which took the form of literature research, was carried out by reading papers and literature about protecting bank customers' private data in digital transactions using primary, secondary (Bank's annual report), and tertiary legal materials.

In the framework of the omnichannel concept, this study examines how to protect customer data used for marketing activities in compliance with the applicable laws. This research aims to identify the regulations that protect customers' personal data when they engage with a company's marketing activities using a multichannel approach. The most current omnibus law concerning the Law of Development and Strengthening of the Financial Sector No. 4 in 2023 and the PDP Law No. 15 in 2022 will be used as the legal foundation for any conclusions and suggestions. Using omnichannel by customers through various types of sales points and modern technology shall be based on the same level of protection standard to protect customer's private data.

Analysis And Discussion

Processing Customer Data And Predicting Customer Behaviour (Profiling)

A convergence of financial innovation in the banking industry over the past ten years has led to a considerable shift away from traditional banking and towards a new digital banking framework.¹⁴ Banking has experienced greater usage of digitalisation in the recent decade, and businesses must alter their approach to transform how they conduct business by improving their technical capacity with the latest technology and responding to customers' demands.

Digital transformation aims to expand the market or create new businesses by providing more digital services to meet customer

¹³ Piotr Łasak and Marta Gancarczyk, "Transforming the Scope of the Bank through Fintechs: Toward a Modularized Network Governance," *Journal of Organizational Change Management* 35, no. 1 (2022): 186–208.

¹⁴ Lee, Wewege, and Thomsett, "Disruptions and Digital Banking Trends."

demand. In doing so, the company will also generate new revenue, which naturally intensifies customer interaction, and due to the corporation's focus on accomplishing its desired goal, the aforementioned situation will also result in a greater probability of conflict. Due to the growing usage of mobile and online banking services among cellphones and users of the internet, as well as of electronic and mobile financial services, retail banking has dominated the digital banking transformation.¹⁵

The digital transformation of Indonesian Bank, which has been expanding and accelerating its digital capacity, attempts to achieve the expected level of client satisfaction. Numerous banks in Indonesia that have digital capabilities, including BCA and BRI, have been enhancing their digital bank capabilities to provide more engaging experiences by actively involving their customers in banking transactions. The digitalization activities undertaken by all of those corporations will lower operating expenses and, as a result, increase corporate income.

The more corporations interact with their customers, the more potential disparity of expectation versus fulfillment; hence, the legal consequences will happen for both parties. The growth and advantages of information and communication technology present both opportunities and difficulties for conducting business and trade while also providing a driver for globalisation. Personal data gathering and data-driven that can predict customer behaviour have reached a grand scale, to the damage of autonomy, confidentiality, and community interests¹⁶. Customer suggests that companies must go beyond simply collecting data and ensure that customers' demands are met profitably at all points of engagement.¹⁷

According to BCA's 2022 annual audit report, it is stated that management is developing digital-based services for customers to enhance efficiency and speed up processes, including partnering synergistically with fintech and e-commerce partners through their subsidiaries and while referring to the PDP Law states that the advancement of information technology has created it very simple to collect and transfer private information about customers from one party

¹⁵ Lee et al, 2020

¹⁶ F Lagioia et al., "AI in Search of Unfairness in Consumer Contracts: The Terms of Service Landscape," *Journal of Consumer Policy* 45, no. 3 (2022): 481–536.

¹⁷ Peter Fisk, "Customer Strategy," in *Customer Genius* (Wiley, 2012), 108–129.

to another without the customer's knowledge. As a result, the privacy of the customer's personal data is at risk, and a violation could ultimately result in both material and intangible losses.

Backbase outlines the digital-first framework, which discusses how existing corporations may successfully contend with new competitors in the digital arena. Smart banking, omnichannel banking, open banking, and modular banking are the four foundations of the framework.¹⁸

Omnichannel management is described as the synergetic management of the multiple available channels and customer interaction points in such a way that consumer engagement throughout channels and channel performance is optimised. As a result, it is recognised that the various channels interact with one another and are used concurrently.¹⁹ In a nutshell, clients freely switch between channels and demand a synchronised experience throughout the client journey. The activities taken through omnichannel are related to the company's objectives, such as increasing revenue, improving customer engagement, and utilising all bank channels. It corresponds to the journey of the master plan and information technology strategy of BRI that consists of, in 2021-2022, BRI built an omnichannel platform and adopted automation in several business processes; in 2023-2024, it will focus on optimizing open banking, and building a digital ecosystem, and in 2025 it will improve customer experience by focusing on next-gen open banking.

Currently, conventional banks are also starting to offer digital services, adopting the omnichannel business model, providing goods and services throughout numerous online and offline points of contact, implying that they have undergone a digital transformation to better

¹⁸ Lam Quynh Trang Tran et al., "Assessing the Digital Transformation in Two Banks: Case Study in Hungary," *Agris on-line Papers in Economics and Informatics* 14, no. 2 (2022): 121–134.

¹⁹ Ricardo Costa Climent, Darek M Haftor, and Soumitra Chowdhury, "Value Creation through Omnichannel Practices for Multi-Actor Customers: An Evolutionary View," *Journal of Enterprising Communities: People and Places in the Global Economy* 16, no. 1 (February 2022): 93–118, <https://www.emerald.com/insight/content/doi/10.1108/JEC-07-2021-0100/full/html>.

meet customer demands and technological advancements.²⁰ Article 16 of the PDP Law defines personal data processing as obtaining and collecting, processing and analysing, storing, repairing and updating, displaying, announcing, transferring, distributing, disclosing, and/or deleting or destroying.

The supported elements (i.e., operational aspect), such as speeding up internal processes and increasing the Bank's efficiencies, should be established in regular operations to intensively carry out marketing activity that includes, for instance, partnering with third-party companies. The organisation responsible for maintaining a client's data should be aware of how to keep it securely, according to the PDP Law, which focuses on protecting customers' personal data. There will be legal consequences if the customer's data privacy is violated.

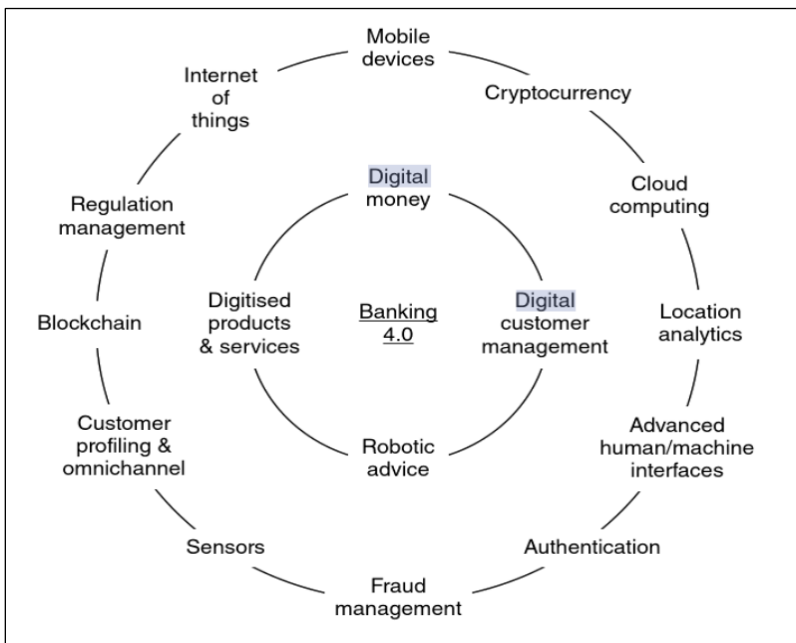


Figure 1: Banking 4.0, 2023²¹

²⁰ Laura Grassi, Nicolas Figini, and Lorenzo Fedeli, "How Does a Data Strategy Enable Customer Value? The Case of FinTechs and Traditional Banks under the Open Finance Framework," *Financial Innovation* 8, no. 1 (2022): 75.

²¹ Tony Boobier, *Prologue: Why Banking?* (Wiley, 2023).

Banking 4.0 (Figure 1) is an idea that corresponds to data-driven banking, which is referred to as the fourth industrial revolution. Banks have to understand their consumers' needs and expectations to launch new products and services quickly and efficiently. This will almost certainly increase complexity, making deployment more difficult when combined with globalisation and developing technical issues.²² Enhancing customer interactions and customer relationship management (CRM) effectiveness are crucial steps for e-commerce businesses to gain a competitive advantage.²³

The several ideas of banking 4.0 (Figure 1) are the needs and expectations of their clients, new goods and services quickly and effectively, the problem of execution, and developing technology. To improve the efficiency of the Bank's operations and to provide customers with convenience, trustworthiness, and security, BCA has also developed several innovations in the field of information technology. BCA uses technology to boost creativity and productivity, develop digital services and apps, and strengthen IT infrastructure capabilities.

BRI emphasises three main pillars, such as digitising core, that aims to boost efficiency and productivity and also build trustworthy relationships with consumers. BRI creates a total digital platform and engages in substantial interaction with the digital environment (the Bank as a Platform) to provide new products and services unconnected to the Bank's primary business.

Discussing digital customer management in areas such as customer relationships, intimacy programs, and partnering with other parties to expand the distribution channel will improve service by significantly engaging with the customer and will ultimately result in an acceleration of the company's income. All of those interactions with the consumer must guarantee that their data will be safely protected in all circumstances. Data processing devices are used to process personal data both electronically and manually According to Article 1, Section 2

²² Wewege and Thomsett, "Disruptions and Digital Banking Trends."

²³ Lei Li, "INVESTIGATING THE EFFECT OF ARTIFICIAL INTELLIGENCE ON CUSTOMER RELATIONSHIP MANAGEMENT PERFORMANCE IN E-COMMERCE," *Journal of Electronic Commerce Research* 24, no. 1 (2023): 68–84.

of the personal data protection law, personal data protection includes all efforts taken for protecting personal data throughout the chain of personal data processing to ensure the protection of the fundamental rights of personal data subjects.

The customer personal data that will be utilised for any Bank purpose at any stage to conduct the Bank's intimacy programme shall comply with the customer data protection law as regulated. According to the Personal Data Protection Law, appropriate protection of personal information by an entity that owns or controls the data will provide the public confidence that personal data will be utilised for a broader variety of public objectives without harming or breaking its individual rights.

Profiling customers by using their private data is prohibited without customer consent and supported by Piotrowicz and Cuthbertson that state, a major problem in the omnichannel commercial environment is maintaining a balance between personalisation and privacy, particularly when customers' data is excessively employed for promotional activities. In addition, a lot of researchers believed that the use of big data and predictive technologies in the retail industry would result in negative reactions from customers because so many consumers were worried about private information breaches.²⁴

According to PDP Law, Article 10's first sentence, personal data subjects have the right to object to decisions that are solely based on automated processing, including profiling, and that have legal implications or substantially affect personal data subjects. Profiling activities are the process of electronically identifying a person, including but not limited to their employment history, financial situation, health, preferences, personality, interests, dependability, behaviour, and location. Therefore, owing to knowing deeper about customer behaviour, the corporation should make the limit of using customer data for marketing purposes and disclose to their customers the boundaries of keeping and utilising their data. De Vries and Zhang also address privacy difficulties with mobile transactions because many

²⁴ Yini Chen and Ting Chi, "How Does Channel Integration Affect Consumers' Selection of Omni-Channel Shopping Methods? An Empirical Study of U.S. Consumers," *Sustainability* 13, no. 16 (2021): 8983.

customers are concerned about privacy issues while utilising a mobile channel for transactions.²⁵

According to PDP Law, Article 21, it is emphasised that the personal data controller is required to provide information about the legality of processing personal data, the purpose of processing personal data, the type and relevance of personal data to be processed, the retention period for documents to be processed that contain personal data, and specifics about the information collected. Details are a list of information on personal data of personal data subjects that are gathered by the personal data controller in the context of processing personal data, including both general and specific personal data. This covers the time frame for processing personal data as well as the subjects' rights.

Real-time customisation is now possible due to big data, as McGuire states, by tracking internet clicks, identifying customer preferences, and forecasting future consumer behaviour. Companies can then be enabled to recognise when customers are about to make a purchase decision and assist them in completing the transaction by combining selected goods with the incentive programme benefits.²⁶ A strategy for omnichannel should aim to deliver an excellent and consistent customer experience across all channels.²⁷

According to recently available data, retail customers who predominantly utilise social or mobile channels are less concerned with their privacy.²⁸ However, the majority of privacy problems (such as those involving Facebook, Twitter, WeChat, and TikTok) have happened on these platforms. Therefore, it is imperative to investigate whether this is changing the importance of customer privacy issues when it comes to various channels.²⁹ Any company's use of customer data for purposes has to be explicitly defined in terms of how long the

²⁵ Dana Schrottenboer et al., "The Effects of Omni-Channel Retailing on Promotional Strategy," *Journal of Theoretical and Applied Electronic Commerce Research* 17, no. 2 (2022): 360–374.

²⁶ Tim McGuire, Michael Chui, and James Manyika, "Why Big Data Is the New Competitive Advantage," *Ivey Business Journal* 76, no. 4 (2012).

²⁷ Pennie Frow and Adrian Payne, "Towards the 'Perfect' Customer Experience," *Journal of Brand Management* 15, no. 2 (2007): 89–101.

²⁸ Shintaro Okazaki et al., "Understanding the Strategic Consequences of Customer Privacy Concerns: A Meta-Analytic Review," *Journal of Retailing* 96, no. 4 (2020): 458–473.

²⁹ Okazaki et al.

data will be used for, the benefits and drawbacks for both parties and with whom the data will be shared. As a result, it is logical and necessary for the company to establish an agreement with the customer before utilising the customer's data for data processing, including the possibility of predicting the customer's purchasing behaviour (profiling activities). Too much information, which causes confusion and anxiety, the lack of opportunities to interact with the products or other customers, and the possibility of breaching privacy are some of the factors that make customers uncomfortable while browsing in a physical store or online.³⁰

The company should therefore be aware of the customer's profile in terms of their openness to receiving several advertisements. A company may emphasise which customers are still comfortable with conventional banking transactions to change consumer behaviour towards electronic banking engagements to maintain an equal level of satisfaction throughout channels. A large number of consumers, according to empirical research, don't read the confidentiality policies and safety certificates of e-commerce platforms. Customers must routinely read and examine privacy regulations and security certificates to make their purchasing experience safer, and this practice can reduce the possibility of security violations.³¹

The experience and satisfaction of customers are correlated with banks' acceptance and utilisation of digital financial services.³² Any financial company that wants to create and provide financial products and services must first consider how its consumers are likely to behave. Through emails, social media, and surveys, sentiment evaluation technology of AI predicts consumer responses, feelings, and responses to determine what the customers will like. This technology gathers data to create and show user-generated content based on their personal preferences and options.³³

³⁰ Bui Thanh Khoa and Tran Trong Huynh, "How Does Anxiety Affect the Relationship between the Customer and the Omnichannel Systems?," *Journal of Theoretical and Applied Electronic Commerce Research* 18, no. 1 (January 2023): 130–149, <https://www.mdpi.com/0718-1876/18/1/7>.

³¹ Saeed, "A Customer-Centric View of E-Commerce Security and Privacy."

³² Umara Noreen et al., "Banking 4.0: Artificial Intelligence (AI) in Banking Industry & Consumer's Perspective," *Sustainability* 15, no. 4 (February 2023): 3682, <https://www.mdpi.com/2071-1050/15/4/3682>.

³³ Noreen et al.

Regarding the Bank's desire to provide more service to its customers and make use of all available banking channels, those discussions didn't specifically address customer data privacy. Disclosure and legitimacy are essential components of omnichannel for gaining over clients and keeping them from opting for the competition during the purchasing process. When integrating channels and permitting usage by customers without compromising consumer privacy, sensitive problems including having customer data and exploiting personal information must be taken into consideration.³⁴

According to Article 34, Personal Data Protection Law, paragraph 1, the personal data controller has to undertake an impact analysis of personal data protection before processing personal data that poses a significant risk to personal data subjects. Processing of personal data, especially processing of specific personal data, carries a high risk. Further, it is stated in paragraph 3 of Law No. 4 of 2023 Development and Strengthening of the Financial Sector that the implementation of opening access to customer data and information is done under laws and regulations, including those about the operation of systems, electronic transactions, and the protection of personal data. The area that is regulated includes the duty to uphold personal data protection when processing personal data, valid owner approval for particular customer purposes, risk management implementation, deletion and/or termination of personal data, processing of transactions and/or consumers withdrawing their consent, as well as governance policies and procedures.

Melero, Sese, and Verhoef as well as Steinhoff et al., bring up the concerns of customers regarding data protection and the significance of taking this into consideration. Thus, techniques like personalization should be handled with the utmost caution, and customers should be certain that their data won't be exploited. When creating a promotional plan in the omnichannel environment, requires an examination of the areas of ethics and data protection.³⁵ Data security and privacy represent protection, including signs such as the disclosure

³⁴ Costa Climent, Haftor, and Chowdhury, "Value Creation through Omnichannel Practices for Multi-Actor Customers: An Evolutionary View."

³⁵ Dana Yagil and Hana Medler-Liraz, "Feel Free, Be Yourself," *Journal of Leadership & Organizational Studies* 21, no. 1 (February 2014): 59–70, <http://journals.sagepub.com/doi/10.1177/1548051813483833>.

of data sources, anonymised data, and information protection mechanisms.³⁶

Based on the above discussion and analysis, it can be drawn that the PDP Law and the Development and Strengthening of the Financial Sector Law No. 4 of 2023 protect customer data from illegal activities that corporations use to process and profile their customers for marketing purposes. Any use of client data requires customer consent.

Collaborating With Third Parties

Digital banking enables banks to develop new services for their customers while also cutting costs associated with mailing statements and doing in-person transactions with customers at branches.³⁷ To support business growth and improve internal business operations, many banks are attempting to increase the capabilities of their technology infrastructures that follow the digital transformation strategy. It should be emphasised that organisations are now able to collect huge quantities of data about their consumers' behaviours and purchasing patterns according to digital transformation, which can be enhanced to create new business models and streams of revenue. This means that corporations that can properly use their data will probably have a big competitive advantage versus those that can't.³⁸

A crucial concern in managing technology is data security. There would be significant repercussions on outcomes including clients' trust, workers' trust, consumers' happiness, staff contentment, sales, and market share if financial and other private information on

³⁶ Cong Cheng and Mengxin Zhang, "Conceptualizing Corporate Digital Responsibility: A Digital Technology Development Perspective," *Sustainability* 15, no. 3 (January 2023): 2319, <https://www.mdpi.com/2071-1050/15/3/2319>.

³⁷ Cajetan I Mbama and Patrick O Ezepeue, "Digital Banking, Customer Experience and Bank Financial Performance," *International Journal of Bank Marketing* 36, no. 2 (April 2018): 230–255, <https://www.emerald.com/insight/content/doi/10.1108/IJBM-11-2016-0181/full/html>.

³⁸ Doina BANCIU, Adrian Victor VEVERA, and Ion POPA, "Digital Transformation Impact on Organization Management and Several Necessary Protective Actions," *Studies in Informatics and Control* 32, no. 1 (March 2023): 49–56, <https://sic.ici.ro/digital-transformation-impact-on-organization-management-and-several-necessary-protective-actions/>.

consumers and staff were compromised or breached.³⁹ For instance, businesses should give objective utilisation data to clients that will make them feel digitally equitable. Customer trustworthiness is an essential element of maintaining a lasting relationship with customers, while customer loyalty is the ultimate goal of the marketing effort. Recently, omnichannel banking has been recognised as the most fascinating marketing strategy for banks wanting to establish their position in the digital banking industry. Companies encounter numerous ethical difficulties in this sequence of transformation processes, including those relating to fair information practises, privacy, and data protection.⁴⁰

The bank's digital strategy employs an omnichannel strategy to optimise consumer experiences and create stronger integration and seamless interactions across channels.⁴¹ Additionally, businesses have a responsibility to provide consumers with fair expected results instead of focusing exclusively on their own financial objectives, specifically if the actual forecasted results are in contrast with those interests.⁴²

Developing digital programmes as the ultimate objective for ensuring customer satisfaction when engaging with Bank channels is a challenging opportunity. On the one hand, it requires a significant amount of work in marketing programmes, such as promotion, approaching consumers, and many risks (i.e., system error, data privacy, etc.), on the other hand, the enterprise is going to have greater effectiveness and productivity. When discussing aspects of seamless activity, it's not only critical to take into account how customers will engage with the bank's channels excitingly and more conveniently, but also how their privacy will be protected when their information is easily accessible and shared in all channels due to technological factors. Retailers often engage with customers on social media by posting

³⁹ Venkatesh Shankar et al., "How Technology Is Changing Retail," *Journal of Retailing* 97, no. 1 (March 2021): 13–27, <https://linkinghub.elsevier.com/retrieve/pii/S0022435920300695>.

⁴⁰ Cheng and Zhang, "Conceptualizing Corporate Digital Responsibility: A Digital Technology Development Perspective."

⁴¹ Tran et al., "Assessing the Digital Transformation in Two Banks: Case Study in Hungary."

⁴² Cheng and Zhang, "Conceptualizing Corporate Digital Responsibility: A Digital Technology Development Perspective."

informative and entertaining material, and they also collect personal information to enhance their personalised marketing techniques.⁴³

The most efficient approach for growing the Bank's customer base and transaction volume is through collaboration with multiple organisations. Customers of partnering companies are potential data that can be developed or generated to sell the goods or services supplied by the partner companies. Customers may not consent to the terms of the exchange of their customer bases, which were initially controlled by each of the firms if their data will be shared with other entities. As stated in Article 3 of the PDP Law, each processing of personal data must have protections to ensure the privacy of the subjects of the data and to prevent the exploitation of their personal information. The regulations also include the principles of prudence and secrecy, which state that anybody involved in the processing or monitoring of personal data must be aware of all factors that could be harmful. As Zhang states, although omnichannel merchants attempt to deliver offers that are customised for consumers, these efforts might potentially raise privacy concerns.⁴⁴

Omnichannel is a prospective digital service that the bank will offer in the upcoming years to both new and existing customers. It will provide an entirely novel transaction experience when interacting with all bank channels, whether they are digital or physical, while also offering the same quality of services.

BCA Mobile banking with 41.7 million daily transactions continues to acquire additional functions and features. BCA is creating a new mobile application to the upcoming omnichannel experiences. The consolidation of the BCA Group's different web channels and seamless partner engagement is made possible by this new application. In addition, BCA is still working on a super applications to improve electronic transactions and offer a comprehensive experience for consumers across all channels (omnichannel).

Technology such as information technology is going to have a big role in risk management in the future as a result of increased

⁴³ Okazaki et al., "Understanding the Strategic Consequences of Customer Privacy Concerns: A Meta-Analytic Review."

⁴⁴ Tingting Zhang et al., "Value Co-Creation and Technological Progression: A Critical Review," *European Business Review* 32, no. 4 (May 2020): 687–707, <https://www.emerald.com/insight/content/doi/10.1108/EBR-08-2019-0149/full/html>.

digitalisation. Marketing technology is the link that connects business, marketing, and technological advances, and it's frequently considered an improvement engineering tool for enterprises that use it.⁴⁵

Legal risk in the form of breaching customer data is prohibited by law, thus, the process of improving the Bank's technological capability is not only to examine the Bank's advantages or disadvantages, such as cost efficiency, maximum productivity via more engagement with its customers across channels to earn higher profit, but also to embed every concern of keeping customers convenience in banking transactions by protecting the customer data.

The seamless activity allows customers to carry out the decision-making process wherever they want, switching between channels and devices based on their requirements and preferences, giving them flexibility in channel selection for each decision-making step. Omnichannel merchants must offer clear, consistent, and seamless information regarding shopping situations, privacy and security guidelines, and the ability to be attended by suppliers (digital and physical) across all touchpoints.⁴⁶

Due to the utilisation of various channels in an omnichannel framework, particularly the use of customer data in partner companies, the risk to the customer's privacy data increases due to higher engagement; as a result, using the customer's data transparently must include obtaining their consent. In order to protect customers' private data safely, the company must also communicate all pertinent information to the client.

In addition, when utilised legally for marketing and advertising, private data creates the greatest privacy risk to customers. The aforementioned potential risks enhance customers' concern when transacting in omnichannel systems, which leads to having no desire of purchasing online or stop doing business with an omnichannel platform shortly after their first purchase, even though they receive numerous advantages and values through online transactions.⁴⁷ Customer

⁴⁵ Loredana Patrutiu Baltas, "Marketing Technology (Martech)-the Most Important Dimension of Online Marketing," *Bulletin of the Transilvania University of Brasov* 5, no. 59 (2017): 44-49.

⁴⁶ Rodríguez-Torrico, San-Martín, and San José Cabezado, "The Role of Omnichannel Tendency in Digital Information Processing."

⁴⁷ Khoa and Huynh, "How Does Anxiety Affect the Relationship between the Customer and the Omnichannel Systems?"

dissatisfaction with the Bank's channels will result in declining channel bank optimisation (counterproductive) owing to the safeguarding of customer data when used for marketing purposes. As a result, under the PDP Law and to comply with the existing law, the company as data keeper may develop a specific system procedure that can cover all relevant aspects of privacy data and can be applied to the customer to obtain their consent to share their data for Bank marketing programmes.

Article 20, number 2 of the PDP Law, which covers activities such as obtaining explicit legal consent from the personal data subject for one or more specific purposes that have been disclosed by the personal data controller to the personal data subject, provides a strong and clear level of protection for the processing of customer personal data. In the case that the personal data subject is one of the parties to the agreement, the responsibilities under the agreement must be fulfilled, or the personal data subject's request must be met. Privacy and security are related to the technical measures taken to guarantee that compliance with laws are met and best practices are followed when handling personal information.⁴⁸

BCA examines trends in the rivalry between banks and non-banks as well as changes in its own capacity to recognise and respond to changes in the business environment, both internally and externally. The increased rivalry and rapid commercialization of products are some of the main reasons for enterprises to make investments in developing omnichannel practices while examining the opportunities of digital technologies.⁴⁹

Giving customers a more efficient and engaging experience through all available digital channels is a realistic strategy, the Bank should take to win in the market for digital products and services. One of the key factors in how the company is going to win in the intense competition is the rivalry among banks. The alternative can be applied to attract partnerships (collaboration) to accelerate the expansion of the banks and putting a priority on digital risk management are crucial factors that should be handled together with a fully digital

⁴⁸ Rodríguez-Torrico, San-Martín, and San José Cabezedo, "The Role of Omnichannel Tendency in Digital Information Processing."

⁴⁹ Costa Climent, Hafitor, and Chowdhury, "Value Creation through Omnichannel Practices for Multi-Actor Customers: An Evolutionary View."

transformation. In an alliance, partners collaborate cooperatively to increase market access and create new, mutually beneficial opportunities.⁵⁰

In today's competitive economic world, few companies have all the resources and they need to compete optimally. As a result, organisations look to partnerships to gain accessibility to the resources they need.⁵¹ Collaborations have developed into vehicles that provide companies with the leverage that they require to succeed satisfactorily in a global market.⁵²

The quickest and easiest way to achieve corporate goals is through collaboration among entities that wish to speed up the achievement of their intended goal in digital transformation. Due to the nature of how each company mobilises and optimises financial transactions by their customers, there is a possibility that customer data will be exploited. As a result, the agreement between parties who have responsibility for data protection and utilising the data should be acknowledged and authorised by the customer. Another firm strategy is to quicken the pace of digitization (i.e., improve client satisfaction along with efficiency) and create a competitive advantage via partnerships with other companies.⁵³

Another option is to outsource the technology activities required to complete the digital transformation if they are well-organized and not overly complicated. When compared to building the required competencies internally, both partnership and outsourcing alternatives can benefit from lower initial investments and risk distribution.⁵⁴

According to Article 24 of the PDP Law, to process personal data, the personal data controller must show evidence that the subject of the data has approved it. This is further explained in Article 27 of the PDP Law, which states that personal data controllers must only process personal data in ways that are limited, specific, legal, and transparent.

⁵⁰ Karthik N S Iyer, "Learning in Strategic Alliances : An Evolutionary Perspective" 2002, no. 10 (n.d.), <http://www.amsreview.org/articles/iyer10-2002>.

⁵¹ R Ireland, "Alliance Management as a Source of Competitive Advantage," *Journal of Management* 28, no. 3 (June 2002): 413–446, <http://linkinghub.elsevier.com/retrieve/pii/S0149206302001344>.

⁵² Iyer, "Learning in Strategic Alliances : An Evolutionary Perspective."

⁵³ Ireland, "Alliance Management as a Source of Competitive Advantage."

⁵⁴ Hess et al., "Options for Formulating a Digital Transformation Strategy."

The most essential aspects influencing marketing activity in the current era are technological advancement, increased use, and individualization.⁵⁵ The individualization process, as described in Article 27 of the PDP Law, can be described as a portion of the marketing activities (i.e., processing, profiling, and collaborating with third parties), which is why the PDP Law regulates the security of customer data.

Furthermore, as stated in article 27, PDP Law, the collection of personal data must be done in a limited and precise manner, regarding the goal of processing, and the purpose of processing must be clear, legitimate, and have been decided at the time of obtaining of personal data. In wealthy countries, omnichannel networks have existed for a long time, and strong legal regulations governing transactions have been established in place.⁵⁶

Transparency in data processing refers to ensuring that the subject of the data already knows what personal information is being processed and how it is processed, as well as that all information and communication regarding the processing of personal data is easily accessible, clear, and understandable. It may be interpreted that transparency is the primary consideration in data sharing and data exchange, therefore strong financial authority regulation or making a tight agreement between the data keeper (the company) and the consumer is also an appropriate and prudent alternative.

Financial institutions must send privacy and leave warnings to consumers to let them know about their data privacy policies and to give them a way to refuse to have their information shared with unaffiliated third parties.⁵⁷ According to Article 239, Paragraph 1 of Law No. 4 of 2023 on the Development and Strengthening of the Financial Sector's Chapter XVIII, an enterprise is required to maintain the confidentiality and security of customer data and/or information.

The legal environment must be acknowledged as an explanatory component in governance decisions because the banking industry is a

⁵⁵ Xalilova Solmaz Dadash, "55th International Scientific Conference on Economic and Social Development" 4 (2020): 167–170.

⁵⁶ Khoa and Huynh, "How Does Anxiety Affect the Relationship between the Customer and the Omnichannel Systems?"

⁵⁷ Thompson J Hangen, "Thompson J Hangen, "We Know What 's in Your Wallet : Data Privacy Risks of a Central Bank Digital Currency," *FEDERAL COMMUNICATIONS LAW JOURNAL* 75 (2023): 81–103.

sector that is heavily regulated. Legal agreements, such as rules mandating specific assets to reduce technical and behavioural uncertainty, can have an impact on the fundamental characteristics of core bank activities in a similar way to technological advancements.⁵⁸ Furthermore, it states in paragraph 3, Article 239, Chapter XVIII, The Development And Strengthening of The Financial Sector, the corporation is required to ensure that the other party protects the confidentiality and security of consumer data and/or information if the company works together with other parties to handle consumer data and/or information. It can be outlined that governing law regarding the use of customer data by partnering companies for marketing programmes or other purposes is not permitted unless it has been approved by the customer.

Conclusion

Financial institutions' technology development, particularly in the banking industry, has benefits as well as drawbacks for both corporations and customers. Any digital company that has been altering its capacity, including those that have just begun to shift from traditional to digital banking, has similar goals, which are efficiency, productivity, fulfilling customer demand, and ending up with higher profitability. Productivity is the company's attempt to increase customer interaction through the utilisation of all accessible electronic channels, called omnichannel, which will lead to more digital interactions with the customer. Owing to a higher transaction frequency, the circumstance has a higher possibility of conflict. According to the PDP Law, the growth of digital financial institutions makes it simpler to gather and transfer customers' private data to other related and unrelated corporate parties in the context of a company's interests without the customer's knowledge.

Before establishing an omnichannel approach, the corporation needs to comply with the PDP Law for the reason both parties are likely to face a serious problem involving customer personal data. The corporation has its own objectives that will satisfy all of its stakeholders, but it also needs to protect the interests of its customers. By using customer personal data, the company must be transparent about using

⁵⁸ Łasak and Gancarczyk, "Transforming the Scope of the Bank through Fintechs: Toward a Modularized Network Governance."

customer data that may harm customer privacy regardless of company objectives, such as all marketing programmes (e.g., intimacy programme, promotional activities). The data is carefully kept for any use under the PDP Law.

The duration of using the data, the goals of using the data to predict purchasing behaviour (profiling activities), and other related or unrelated parties that will obtain customer data are just a few examples of how the company must limit the use of customer data for internal marketing processes in its omnichannel strategy. Before engaging, both parties must establish a legal agreement to prevent future conflicts and using client information as anonymized data in marketing activities is an idea that may be discussed.

To sum up, the PDP Law and the Development and Strengthening of the Financial Sector Law No. 4 of 2023 both directly and strictly regulate how customer data is used for processing and profiling by financial institutions, and both laws require customer consent before any activities are established.

The corporation must be concerned with customer trustworthiness when collaborating with third parties on marketing programmes in an omnichannel approach by disclosing all activities that use customer data in the company's marketing activities. Spreading a customer's private information to third parties is particularly crucial because it's possible that the customer does not know, interact with, or agree to engage with particular third parties who collaborate with the Bank, hence each engagement with third parties must be approved by the customer, who legally owns that data.

In an omnichannel approach, digital marketing will enable a faster rate of capturing prospective consumers and maintaining current customers. In this regard, on the one hand, the client will be informed sooner than through traditional marketing, but on the other hand, certain customers do not require the information offered by the bank. That circumstance will put them at a higher risk of illegal activities on their private data, so it should be governed by the company to make the guidelines on what kind of customer data they want to be shared, which should be agreed upon by the Bank customer before the execution stage. Customers have the right to choose any behavioural type while purchasing any bank's products at any Bank's channels.

Any improper use of customer data by the company would have an impact on the company's reputation hence, putting all common risks into a risk assessment process and ending up with an equal treatment solution for both parties will be a reasonable and proper way. Any aspect of digital marketing that involves consumer data, such as processing, profiling, and partnering (collaboration) with third parties, can be established in agreement with the customer, and it is possible to completely avoid or drastically reduce the possibility of future disputes with the consumer.

Therefore, in conclusion, collaboration with third parties for marketing purposes to speed up the achievement of the company's goals through the use and sharing of customer data (specific or general data) by the collaborated enterprises is allowed with customer approval and is governed precisely and strictly by PDP Law as well as the Development and Strengthening of The Financial Sector Law Number 4 of 2023. Utilising omnichannel and protecting consumer privacy at the bank should be accomplished in a sustainable and integrated framework.

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