

## ABSTRAK

Layanan Aplikasi *Over The Top* (OTT) sekarang ini tidak dapat lepas dari kehidupan setiap orang. Teknologi yang semakin canggih sehingga dapat mempermudah komunikasi jarak jauh membuat salah satu jenis OTT, yaitu layanan OTT *communication services*, seperti WhatsApp, digunakan masyarakat tanpa mengkhawatirkan risiko yang ada, yaitu penyalahgunaan data pribadi. Penyalahgunaan data pribadi merupakan bentuk pelanggaran atas hak privasi yang dapat dipertanggungjawabkan secara langsung kepada penyedia layanan OTT *communication services* sebagai pihak pengumpul data pribadi penggunanya. Namun, belum disahkannya rancangan undang-undang yang secara khusus mengatur mengenai perlindungan data pribadi di Indonesia menunjukkan bahwa pengguna OTT *communication services* belum mendapatkan perlindungan hukum yang memadai atas data pribadinya. Sedangkan, prinsip-prinsip penyelenggaraan data pribadi tidak dapat dijamin hanya oleh syarat dan ketentuan maupun kebijakan privasi layanan OTT *communication services*.

**Kata Kunci:** *Over The Top Communication Services*, **Data Pribadi, Hak Privasi, RUU Perlindungan Data Pribadi.**

**ABSTRACT**

Over The Top (OTT) services now cannot be separated from the life of every person. Increasingly sophisticated technology that can facilitate long distance communication makes one kind of OTT, the OTT services communication services, such as WhatsApp, used by people without worrying about the risks involved, namely the misuse of personal data. Misuse of personal data is a violation of privacy rights that can be accounted directly to the provider of OTT communication services as the collector of its users' personal data. However, the bill that specifically regulates about protection of personal data in Indonesia that is not legalized, yet, shows that users of OTT communication services have not received adequate legal protection on personal data. Meanwhile, the principles of personal data cannot be guaranteed only by the terms and conditions and privacy policy OTT services communication services.

**Keywords:** *Over The Top Communication Services, Personal Data, Privacy Rights, The Bill of Personal Data Protection.*