

Protection of Personal Data in Criminal Press Releases: Study on Public Information Disclosure at the Padangsidempuan Police Resort

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Abstract

This research is a study of the protection of personal data in the information release of terrorist criminals by the padangsidempuan police resort based on the literature related to the issue at hand and various regulations. This study uses normative legal research with statute approach and conceptual approach by conducting review to the Law on Public Information Disclosure, the Press Law, the PDP Law, and the issuance of press release in some official police websites. Results: it is demonstrated that press releases on criminal will become an instrument of disclosure of public information and accountability of police performance, but the identity or personal attributes, or some specific information of suspects, victims, and related persons, should be restricted sufficiently. Such restrictions are imperative in order that public information disclosure will not be transformed into the invasion of privacy and life or personal data protection. This study suggests that the balance between public information disclosure, freedom of the press, and protection of personal data should be based on the philosophy of selectivity, data minimization, and consequence testing. Therefore, criminal press releases may continue to serve its informative and accountable purposes without compromising the dignity and rights of the subjects of personal data.

Keywords: Personal Data Protection; Press Release; Public Information Disclosure.

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2nd International Conference on Islamic Community Studies (ICICS)

Theme: History of Malay Civilisation and Islamic Human Capacity and Halal Hub in the Globalization Era

<https://proceeding.pancabudi.ac.id/index.php/ICIE/index>

Introduction

The expansion of digital space has speeded-up the dissemination of legal-police information in terms of distance, time, and accessibility [1]. Such transparency is also in line with the citizens' right to information as regulated under Law Number 14 of 2008 on Public Information Disclosure (UU KIP), which also specifies the types of information that shall be made accessible to [...] the public and types of information that is exempted from disclosure [2]. Meanwhile, Law Number 27 of 2022 on Personal Data Protection (UU PDP) recognizes the existence of principles, rights of data subjects, obligations of data controllers, restrictions in utilizing personal data, and administrative and criminal sanctions [3]. In the press sector, UU Pers reaffirms press freedom as a fundamental element of democracy [4]. Consequently, the question of the publication of criminal press releases is not only one of openness but also of the safe parameters for revealing a person's name, background, and other personal details.

This matter is relevant when the police institution releases the result of law enforcement through a press release. For instance, on the official Tribrata News of the North Sumatra Regional Police, the Padangsidempuan Police Resort announced its achievements in dealing with narcotics cases for the whole of 2023, reporting 137 cases, 164 suspects, and evidence amounting to 70.1 kilograms of marijuana and 3.7 kilograms of methamphetamine, and in another release mentioned the seizure of in excess of IDR 1.6 billion from the state [5]. These types of disclosure patterns suggest that police press releases are a form of public information and performance accountability [6], but they also open the door for the possibility of suspect, victim, witness or related party personal data entering the public domain. This competing interest between public, law enforcement and right to privacy is the central context of this study.

The results of prior research have shown that personal data protection in Indonesia is perceived as a matter of uncertainty in terms of normative. Qofifah et al. [3] discuss legal protection of personal data as an effect of the information and communication technology development, whereas Widodo et al. [7] state personal data is sensitive and is a privacy right based on constitutional right. Earlier, Anggraeni [8] stressed the debate on the question of personal data ownership and the need for legal unification and reform in Indonesia. These three studies are significant because they serve as a basis for the fact that the personal data is not considered as simple administrative information but rather as a subject of legal protection and the release of which should be limited in certain circumstances when it clashes with public interest.

Closest, more related studies to public disclosure also reveal this tendency. Zulaichah et al. [9] stated that the parties' identities in court decisions are regarded as personal data that is very related to honor and privacy, thus anonymization of identity is required in particular situation. Trisnaningrum and Kartika [10] analyzed the protection of law for the press between Indonesia and Australia, and highlighted that a normative-comparative method can be applied to determine the equilibrium of press freedom with legal protection. Sumarwan et al. [11] claimed that the Personal Data Protection Law could have an impact on press freedom, if it is not aligned with the Press Law, thus necessitating the overhaul of the press standards. Alamsyah and Wiraguna [12] also highlighted the competing interests of the duty to safeguard personal information and the freedom of the press particularly as they relate to the absence of any clear direction regarding the utilization of journalistic exceptions.

Protective theory of the legal system Protection of legal subject is possible through 1) preactivity, that is legal protection itself and 2) postactivity, that is response of legal system regulation [13]. This is why this theory is appropriate to consider in relation to whether the release of the press releases to mitigate harm to privacy in the beginning, or just provides legal remedies once they are violated. Adds to this Lawrence M. Friedman's theory of legal system to explain the interplay of legal structure, substance and culture and thereby to understand issue not just from phrasing of legislation but also from practices within institution, published habits and degree of

transparency within police [14]. The balancing of rights is also a helpful concept for framework as multiple reports suggest there needs to be a screening of information that could cause harm to any party to the information, without compromising public disclosure of information.

This research is motivated by the fact that there are still a few studies that specifically discuss the criminal press release in district police particularly at the Padangsidempuan Police Resort by combining elements of the Personal Data Protection Law, Public Information Disclosure Law and Press Law in one normative study. The contribution of this paper is to zoom in on a specific case – the disclosure of public information through the police press release on criminal acts – and critically evaluate if the employed mechanism leads to sufficient protection of personal data or may contribute to a stricter regulation on identity anonymization, information limitation and policy instructions in its application.

The problem statement in this research is aimed to investigate the personal data protection regulation in the criminal press release publication, the practice of criminal press release publication at Padangsidempuan Police Resort from the public information disclosure point of view, and the formulation of ideal personal data protection so that it can be a balance of public information disclosure and the right of privacy. Based on this, this paper will analyze the information disclosure act's norm on personal data protection in criminal press release publication, pinpoint the potential threats to personal data, and conceive a proportional protection model to harmonize the public information disclosure and privacy right.

Literature Review

Theory of Legal Protection

Relevance Hadjon's Theory of Legal Protection Philipus M. Hadjon's theory of legal protection is applicable as the primary basis in this study because it puts the law as a tool to protect dignity, honor, and rights of legal subjects from the arbitrary act [13]. ProtectionProduct = Legal protection is analogous to two product types, which can be regarded as a preventive or a repressive product. Preventive protection operates before a violation of law and after occurrence of unlawful act preventive protection functions [15]. This build is parallel to the Personal Data Protection Law which contains provisions regulating principles, types of personal data, rights of data subjects, obligations of data controllers, prohibitions in utilizing data, sanctions and dispute resolution mechanism [3], [16]. So, Hadjon's theory can be utilized to determine whether the criminal press release has acted as a deterrent to prevent an excessive disclosure of personal data or whether it only provides protection after a violation has been done.

Legal System Theory

Lawrence M. Friedman's theory of the legal system offers a more solid basis to explain why the protection of personal data cannot rely on the text of law alone. Friedman conceptualizes the legal system in terms of three related components: legal structure, legal substance, and legal culture [14]. In the present analysis, legal substance is found in the Public Information Disclosure Law, the Press Law, and the Personal Data Protection Law; legal structure is manifested in the agencies, the officials, the police public relations division /Public Information and Documentation Officers; legal culture is exhibited in the established routine of prompt information dissemination and the public's ideal of transparency. Friedman's framework provides a way of thinking about whether the challenges of criminal press releases can be attributed to the absence of clear guidance, institutions not yet prepared to handle them, or a culture of openness that has yet to be balanced with caution.

Public Informational Disclosure, *the Public Interest Test* and the Balancing of Rights

Is also applied to this theory of public information disclosure in light of the balancing right principle. The Right to Know in the Public Information Disclosure Material The Public Information Disclosure Law declares that information is a basic necessity, the right to know is a human right, and information disclosure is a pivotal aspect of the democratic state. At the same time, the law recognizes the existence of information that must be protected, i.e. confidentiality due to legal

obligations, propriety or the public interest, and subject to a test by means of consequence assessment and balancing of public interests [2]. In this sense, the police's publication of criminal press releases has to be allowed as a practice of publicity. The Press Law also considers press freedom as an expression of the sovereignty of the people and a crucial factor of democracy, hence the solution to the openness/privacy conundrum must be found at a balanced point [4].

Research Methodology

This research is a normative study using law and regulation approach, and a little bit case approach to the edition of criminal press release published by the Padangsidempuan Police Resot [17]. The secondary legal material consists of Law No.14 of 2008 concerning Public Information Disclosure (UU KIP), Law No.40 of 1999 concerning the Press(UU Pers), and Law No.27 of 2022 concerning Personal Data Protection (UU PDP). Secondary legal materials are in the form of information from the padangsidempuan police resort official website, books, journals and related past research. Everything was done by desk research and was then analyzed qualitatively and descriptively using deductive reasoning [18], that is, from general norms and theories to particular evaluation on whether publishing criminal press releases correspond to the principle of public information disclosure but also protect personal data.

Results

The regulation of protection of personal data in the publication of criminal press releases

Protection of personal data in the publication of criminal press releases must be analysed through the optics of legal issues that concern the right to information, the freedom of the press and the right to privacy. The protection of personal data is regarded as a protection activity of personal data through a number of procedures of data processing to ensure constitutional rights of the data subjects under the Personal Data Protection Law, and it is a subject to the categories of personal data, data subject's right, prohibition on use of personal data and penal provisions [3], [16]. Within the context of this research, it must be noted that these regulations are significant because police press releases routinely include names, short case histories, or even personal traits that can be classified as personal data.

From the standpoint of the disclosure of information, the Law on Disclosure of Information to the Public declares that information in the public interest shall be disclosed in the principle, but that it still has clear restrictions. Principle of open information in Article 2 paragraph (1) and Exceptions to information in Article 17 (which is including letter a, b, c, d, e, f, i and j). Also relevant to consequences testing is article 6 paragraph (3), which further codifies that consequences testing is to inform the decision of whether to disclose or withhold information [2]. Concerning the criminal press releases, the provision reiterates that public information disclosure must be accompanied by a balancing of the consequences of making known the identities or personal information of the parties to the case.

From the standpoint of freedom of the press, the national press is regarded as a means for the freedom to seek, receive and impart ideas and information under the Press Law. The press shall not be censored or subjected to any other form of prior restraint, nor shall it be compelled to disclose its sources, but it has the right to investigate, receive and publish news. The freedom of the press is established in article 2 paragraph (3) and it is explicitly guaranteed to the press in article 4 paragraph (3). These rules are important because the police need to handle press releases intended as public accountability with care so they don't become disclosures that cross ethical and legal lines [11].

Article 11, when directly related to the Personal Data Protection Law, Article 11 provides data subjects with the right to suspend or limit the processing of his/her personal data under the specified conditions and that they do not lose ownership of their data products, hinting that data

subjects are not the absolute owner of their data. Furthermore, the law states that personal data is made up of “general” and ‘particular’ personal data. General data is composed of full name, gender, nationality, religion, and marital status, and specific data is composed of (but not limited to) health data, biometric data, genetic data, criminal records, children's data, and personal financial data. Paragraph (2) of Art. 65 also shows the prohibition to the exposure of personal data which is not belonged to one self, which is in the concern of criminal press releases to be considered as mentioning identities or personal details without adequate grounds may be found to be contested [16].

An investigation into the Supreme Court decision copy directory reveals that making public information available might be at odds with shielding personal identity if the names and information of the parties involved are not adequately anonymized [19]. Studies of the mass media dilemma in the digital age underline for the practice of data anonymization, data subject consent, and the convergence between the journalistic code of ethics and the Personal Data Protection Law in order to ensure that the press freedom is not compromised by the expectation of privacy [12]. The tension between press freedom and protection of personal data is also shown in a study of press freedom in the legal protection of personal data in Indonesia [11]. While the study of media relations practices of the West Nusa Tenggara Regional Police Public Relations Division reveals that the use of press releases continues to be the primary tool by which the police construct their institutional image and provide information to the public [20]. These researches are significant to reinforce that the problem being reviewed are not just talking about telling information but within the legal borders, ethical and publication governance by state institutions.

The Availability of Criminal Press Releases at Padangsidempuan City Police from the Public Information Disclosure Perspective

The tendency of the Padangsidempuan Police Resort in distributing criminal press release through the official Tribatanews channel is more likely as a means to accountability and public relation especially in the cases of narcotics, corruption and fuel subsidies abuse. In a number of the reports, the status of case investigation, as well as case figures, number of suspects, evidence, police results and prosecution results were released by the police. This trend should be read through the lens of the public information disclosure theory as public institutions are supposed to inform the society about any information that can be considered as being in the public interest, while keeping secret certain information that falls under the exempted category and taking into account potential outcomes of [19], [21] its disclosure.

Tabel 1. Press Release Publikasi Polres Padangsidempuan

No.	Release the Publication Press	Main Content	Relation to the Protection of Personal Data
1	"Police in Padangsidempuan Seized 70.1 kg of Marijuana and 3.7 kg of Methamphetamine for the Whole 2023 "	Compiles an annual report, covering 137 drug cases, 164 suspects, drug evidence such as marijuana, methamphetamine, and ecstasy, as well as the protection of more than IDR 1.6 billion of state money[5].	It is possible: while transparency about institutional performance is demonstrated, there is also the possibility of identification through case numbers, official positions, and contextual information, should the information not be censored in proportion.
2	"Repeat Offender Nabs for Hotel Meth Dissemination"	News of DJR/DMR alias Dedi's arrest in the Padangsidempuan Utara	As well as showing the offender status, such releases may include details about

		district in the narcotics case [22].	location and identifying information which makes the person easily identifiable to the local community.
3	"Police of Padangsidimpuan Capture Subject in Case of Abuse of Subsidized Fuel"	States a man identified only by his initials AHH (28) was arrested on the charge of illegal carriage and/or trade of subsidized fuel [23].	The use of initials is intended to restrict identification; however, since age and place of residence are stated, the data subject could still be associated with a certain social milieu.
4	"53 Years Old Man Arrested in Padangsidimpuan with 900 Grams of Marijuana on the Trans-Sumatra Toll Road"	Suspect with initials Ms alias Ks alias Bs was arrested in Batunadua Julu as the implementation of Operation Antik Toba 2026 [24].	This edition shows a publication pattern to provide minimal identifiable information, the place where the incident occurred and the kind of evidence seized. From a normative point of view, it still has to be determined if the provided information was proportionate to the aim of public disclosure.

From the information in the above table Was evident that»release (press-release) has been the most dominant feature in the Padangsidimpuan Police Resort as a tool to inform the results of the enforcement, especially in violation of narcotics, which are the most dominant themes in the release that can be found. From the perspective of the Public Information Disclosure Law, it is consistent with the principle that public information should, in principle, be disclosed, However, that does not mean that all the elements including the information on an individual case be disclosed without limitation. The information-based law declares an existence of exceptions and a mechanism to consider consequences, thus, I think that extreme disclosure of the identity or personal trait of suspects needs to be reconsidered on whether it is necessary for the public interest [2].

If reading the theory of legal protection and the theory of legal system by Friedman, then according to the practice of the criminal press release conducted by the Padangsidimpuan Police Resort describes a link between legal substance, legal structure, and legal culture. The legal material is known through EUID, Access to Public Information Act, Press Act and Personal Data Protection Act. The diplomatically charged structure is evident within the public relations/investigators work and the official Tribratanews channel. The legal culture is manifested in a police institutional predilection to integrate media releases into the performance transparency. Previous research of Yuliawati and Irawan [25] regarding Indonesia National Police cyber public relations reveals that online public information services are inclusive of the mandate of public information disclosure but needs further enhancement on quality of management and system protection. The findings of Jones et al. [26] underscore that media partnership and appropriate information provision enhance institutional policing professionalism and portray social media as a tool to promote police responsibilities and functions.

The study of Wahyudin and Sumanto [21] is also important because it reconfirms that the diverging forces relating to freedom of the press and the right to protect personal data indeed have been problematic. They argue that journalists or media outlets may handle the personal data of their public interest purposes, but continue to comply with the boundaries of obtaining data subject

consent and relying on a legitimate interest. In the case of Padangsidempuan Police Resort, the reading is that has potential publish manner of improvement in which information actually needed by people can be given, but specific ones such as full identity and address or anything that might make a person easily identified should be limited or could be made anonymous. In this way, the analysis strengthens the view that official press release procedures already carry out openness-as-function, but may still need to be subject to more rigorous testing so as to avoid conflicting with the protection of personal data.

Equilibrium Between the Right to Information and Protection of Personal Data in the Release of Criminal Press Releases

In the context of public information disclosure and legal protection theories, the balancing point of this study is expressed as public information is always open, but the exceptions are to the principle of strict and narrow interpretation. The PIDA decrees that all public information should be disclosed, the information exempted from disclosure is strict and limited, and the mode of information acquiring should be rapid, timely, inexpensive and easy [2]. However, the Public Information and Documentation Officer is also obliged to perform a careful consequence test prior to the exhaustion of positivity in manifesting information exempt, and documents with exempted content can be censored [27]. And the Law on Protection of Personal Data, includes principles, types of personal data, rights of the data subject, processing of personal data, duties of processors and controllers, transfers, penalties for violations, institutional arrangements, community involvement, prohibition on the use of personal data, and criminal sanctions. Within the press domain, the Press Law maintains a sphere in which the press is free, and the journalist can refuse (their) right, meaning that openness of information, privacy, and journalistic labour are to be interpreted as rights that balance each other out, or as rights that are in a dialectical relationship with each other and not in a negational relation with each other [6], [28].

If one applies this principle to the dissemination of “crime press releases” by police departments, the only information that should be released is information the public-need-to-know is what could be considered genuinely relevant to public interest, such as the nature of the case, the progress in handling, the evidence, and whether it is necessary to hold police action accountable. Portions that may infringe on personal rights should be limited. This logic is consistent with the Public Information Disclosure Act which also provides for the partial disclosure of documents containing national interest considered material, as well as its harm balancing test, that weighs whether releasing a certain piece of information will more likely inform the public as opposed to exposing them to risk [2], [9]. In this consideration, the principle of proportionality is also applicable, it is not allowed that press releases become a source for disclosing all personal data just because a decision creates public interest [29]. Hence, a model of selective transparency seems the most suitable option in which performance and law enforcement are fully transparent but there is a semblance of minimalism when it comes to personal identity.

Previous research supports this trend. A number of studies Alamsyah and Wiraguna [12] Sumarwan et al. [11] argue that is now pushing the tension between press freedom and the duty to protect the personal data of individuals, which requires anonymization, internal regulation, and be harmonized with Press Law and Public Information Disclosure Law press freedom may conflict with obligation to protect the personal data, and they stress on d Anonymization, existence of internal regulation, and harmonization with Press Law and Public Information Disclosure Law. Arifin and Handayani [30] highlight in their study that the freedom of the press must be responsible so that its coverage of criminal law and human rights can be balanced. These results show a similar pattern, where the problem was not about what the public needs to know but about how much identity and personal data can be disclosed.

Based on these theories and previous researches, the point of view in this research is the disclosure of criminal press release at Padangsidempuan Police Resort should be treated as the tool of public accountability that is still subject to data minimization principle. That is, the police can and should release information to explain the why of law enforcement actions, but they must withhold or redact information in regard to identity, address, personal history, and the like that is not plainly necessary to the public and in so doing, consider whether such information is of a kind that implicates personal rights or might lead to social stigmatization. The ideal disclosure of information to the public is when it is justified, after consequence testing, redacted in part and based on an integrated reading of the Public Information Disclosure Law, the Press Law and the Personal Data Protection Law. This paper challenges with the position that personal data protection is an obstacle in achieving transparency in the context of criminal press release, but not such to render transparency in a criminal press release lawful, proportionate and civilized.

Conclusion

In light of the above normative analysis, it can be said that the publication of criminal press releases by the police is generally permitted under the public information disclosure, but it has to harmoniously be balanced with personal data protection and freedom of the press. The Public Information Disclosure Law secures the principle of open government that has exempted information, the Personal Data Protection Law provides principles and data subject rights, obligations of controllers, prohibition on the utilization of personal data and sanctions, the Press Law still guarantees the freedom of press within the responsibility corridor. Thus, the answer to the research question is that the personal data contained in press releases about criminals should not be more than necessary, that is, limited to what really fulfils the public interest and helps to hold the law-enforcement accountable. Therefore, the aim of this research is to support a selective, proportionate model of disclosure of which also upholds the privacy and dignitarian rights of personal data subjects.

References

- [1] A. Cullen and M. L. Williams, "The digital turn in police image work: determinants of adoption, use and perceived effectiveness of social media communications in forces in England & Wales," *Polic. Soc.*, pp. 1–21, 2026, doi: 10.1080/10439463.2026.2618811.
- [2] R. Ricky and M. T. A. Rahimallah, "Public Information Disclosure: Holistication and Acceleration of Good Governance in Indonesia," *J. Ilm. Wahana Bhakti Praja*, vol. 12, no. 2, pp. 62–75, 2022, doi: 10.33701/jiwbp.v12i2.2911.
- [3] W. I. Qofifah, M. Dirgantara, F. Maulana, and Z. Fahmi, "Organizational Communication Ethics and Personal Data Protection: A Review of the Personal Data Protection Law," *SHISHYA Stud. Perspect. Law Justice*, vol. 2, no. 1, pp. 47–63, 2026, [Online]. Available: <https://nayottamareswara.co.id/index.php/jhpa/article/view/27>
- [4] A. R. U. Balahmar, "Press Freedom: Using the Role of Government and Reporters in the Development of Democracy in Indonesia," *J. Hunan Univ. (Natural Sci.)*, vol. 48, no. 3, pp. 122–127, 2021, [Online]. Available: <https://jonuns.com/index.php/journal/article/view/555>
- [5] D. Y. Kumbara, "Sepanjang 2023, Polres Padangsidempuan Gagalkan 70,1 Kg Ganja dan 3,7 Kg Sabu," *TribrataNews Sumut*. [Online]. Available: <https://tribratanews.sumut.polri.go.id/sepanjang-2023-polres-padangsidempuan-gagalkan-701-kg-ganja-dan-37-kg-sabu>
- [6] M. Fatiin, A. F. Sonni, and R. Saeni, "Effectiveness of Police Press Release Presentation on Journalists' Information Satisfaction," *Palakka Media Islam. Commun.*, vol. 6, no. 1, pp. 59–71, 2025, doi: 10.30863/palakka.v6i1.8872.

- [7] J. E. Widodo, A. Suganda, and T. A. Darodjat, "Data Privacy and Constitutional Rights in Indonesia," *Pena Law Int. J. Law*, vol. 2, no. 2, 2024, doi: 10.56107/penalaw.v2i2.187.
- [8] S. F. Anggraeni, "Polemik Pengaturan Kepemilikan Data Pribadi: Urgensi untuk Harmonisasi dan Reformasi Hukum di Indonesia," *J. Huk. Pembang.*, vol. 48, no. 4, pp. 814–825, 2018, doi: 10.21143/jhp.vol48.no4.1804.
- [9] S. Zulaichah, S. K. W. Amnesti, and N. Istiqomah, "Public Information Disclosure and Personal Data Protection in Court Decisions: Legal and Islamic Law," *Negara Huk. Membangun Huk. untuk Keadilan dan Kesejaht.*, vol. 15, no. 2, pp. 265–283, 2024, doi: 10.22212/jnh.v15i2.4528.
- [10] R. A. Trisnaningrum and A. W. Kartika, "Perlindungan Hukum bagi Pers dalam Melaksanakan Kebebasan Pers di Indonesia dan Australia," *J. Huk. Pembang.*, vol. 54, no. 2, pp. 357–390, 2024, doi: 10.21143/jhp.vol54.no2.1593.
- [11] U. Sumarwan, A. Hidayat, and L. T. A. L. Wadfhani, "The Future of Freedom of Press in Indonesia After the Personal Data Protection Law Era," *Indones. Law Rev.*, vol. 13, no. 2, pp. 143–155, 2023, doi: 10.15742/ilrev.v13n1.2.
- [12] R. Alamsyah and S. A. Wiraguna, "Dilema Media Massa di Era Digital: Antara Perlindungan Data Pribadi dan Kebebasan Pers Dalam UU PDP," *Media Huk. Indones.*, vol. 2, no. 6, pp. 107–116, 2025, doi: 10.5281/zenodo.15486207.
- [13] P. M. Hadjon, *Perlindungan Hukum bagi Rakyat di Indonesia*. Surabaya: PT. Bina Ilmu, 1987.
- [14] L. M. Friedman, *The Legal System: A Social Science Perspective*. New York: Russell Sage Foundation, 1975.
- [15] S. Rahardjo, *Ilmu Hukum*, Cet. 5. Bandung: Citra Aditya Bakti, 2000.
- [16] M. R. Syailendra, G. Lie, and A. Sudiro, "Personal Data Protection Law in Indonesia: Challenges and Opportunities," *Indones. Law Rev.*, vol. 14, no. 2, pp. 56–72, 2024, doi: 10.15742/ilrev.v14n2.4.
- [17] P. M. Marzuki, *Penelitian Hukum Edisi Revisi*, Cet. 13. Jakarta: Kencana, 2017.
- [18] O. C. Robinson and D. Bailey-Rodriguez, "Deductive qualitative research: an integrative approach to designing studies," *Qual. Res. Psychol.*, vol. 23, no. 2, pp. 369–384, 2026, doi: 10.1080/14780887.2025.2604773.
- [19] F. A. Nulhakim, "Aspek Keterbukaan Informasi Publik dalam Kaitannya dengan Perlindungan Data Pribadi yang Terpublikasi pada Direktori Salinan Putusan Mahkamah Agung dalam Perkara yang Diatur dalam KMA Nomor 1-144/KMA/SK/ I/2011," *J. Huk. dan Pembang. Ekon.*, vol. 10, no. 2, pp. 306–323, 2022, doi: 10.20961/hpe.v10i2.65115.
- [20] D. L. Miharja, B. V. Safitri, and M. R. Mauliashari, "Aktivitas Media Relations Humas Polda NTB dalam Rangka Memperbaiki Citra Kepolisian," *J. Ilm. Mhs. Komun.*, vol. 3, no. 1, pp. 1–9, 2022.
- [21] A. Wahyudin and L. Sumanto, "Kebebasan Pers dalam Kerangka Hukum Pelindungan Data Pribadi di Indonesia," *J. Law, Adm. Soc. Sci.*, vol. 4, no. 5, pp. 683–690, 2024, doi: 10.54957/jolas.v4i5.823.
- [22] A. Saragih, "Nekat Edarkan Sabu di Hotel Seorang Residivis Berhasil di Bekuk Polisi," *TribrataNews Sumut*. [Online]. Available: <https://tribratanews.sumut.polri.go.id/nekat-edarkan-sabu-di-hotel-seorang-residivis-berhasil-di-bekuk-polisi>
- [23] E. Sijabat, "Polres Padangsidempuan Amankan Pelaku Penyalahgunaan BBM Subsidi," *TribrataNews Sumut*. [Online]. Available: <https://tribratanews.sumut.polri.go.id/polres-padangsidempuan-amankan-pelaku-penyalahgunaan-bbm-subsidi>
- [24] Admin Humas Polda Sumut, "Pria 53 Tahun di Padangsidimpuan Ditangkap Saat Bawa 900 Gram Ganja di Jalinsum," *TribrataNews Sumut*. [Online]. Available: <https://tribratanews.sumut.polri.go.id/pria-53-tahun-di-padangsidimpuan-ditangkap-saat->

- bawa-900-gram-ganja-di-jalinsum
- [25] Y. Yuliawati and E. P. Irawan, “Peran Cyber Public Relations Humas Polri dalam Memberikan Pelayanan Informasi Publik secara Online,” *J. Polit. Indones.*, vol. 1, no. 1, pp. 208–220, 2016, doi: 10.35706/jpi.v1i1.308.
 - [26] M. Jones, L. Ralph, A. Millie, and M. Rowe, “Policing and social media: Exploring police digital visibility,” *Criminol. Crim. Justice*, p. 17, 2025, doi: 10.1177/17488958251338572.
 - [27] D. Gusman, “Pembatasan Hak atas Informasi Publik di Indonesia,” *UIR Law Rev.*, vol. 6, no. 2, pp. 90–98, 2022, doi: 10.25299/uirlrev.2022.vol6(2).8892.
 - [28] H. P. Wiratraman, “Indonesia’s Press Freedom And Law at Twenty-Five: Achievements, Legal Changes And Continuing Challenges,” *J. IUS Kaji. Huk. dan Keadilan*, vol. 13, no. 2, pp. 290–308, 2025, doi: 10.29303/ius.v13i2.1761.
 - [29] K. K. Caesar, “Balancing the Right to Privacy and Media Freedom in Light of Public Interest,” May 24, 2025, *SSRN*. doi: 10.2139/ssrn.5266981.
 - [30] Z. Arifin and E. P. Handayani, “Perlindungan Hak Asasi Manusia dalam Konteks Pelaksanaan Hukum Pidana Pers,” *Pros. Semin. Huk. Aktual*, vol. 2, no. 4, pp. 48–61, 2024, [Online]. Available: <https://journal.uui.ac.id/psha/article/view/35004>