

Law Enforcement Against Image Copyright Infringement Related to Product Information in E-commerce as a Realization of Healthy Competition

Dimas Asep Saputra^{1,*} and *Tina Amelia*²

¹ Faculty of Law, Borobudur University, Indonesia

² Faculty of Law, Borobudur University, Indonesia

Abstract. The digital era has witnessed the emergence of e-commerce as a dominant platform through which consumers can procure a vast range of products and services. However, a significant challenge that often emerges is the use of similar or identical product images by numerous online stores, which can potentially lead to consumer confusion with regard to the authenticity and source of the product in question. This also raises legal concerns related to intellectual property, where the owner of the original image may potentially face losses due to the unauthorized use of the image by other parties. In order to ensure fair competition and to protect the interests of consumers, it is of the utmost importance to provide effective legal protection for product image copyright in the context of e-commerce. This research employs a normative research method with a legislative approach and analysis. The findings demonstrate the necessity for copyright protection in the context of e-commerce, with a view to regulating the use of similar or identical images for product information. Images of products are considered to be creative works that are protected from the moment of their creation. The concept of fair use may permit image utilization without prior permission in certain circumstances. Conversely, copyright infringements may give rise to legal action, including the termination of image use, financial compensation or penalties. Furthermore, international treaties provide protection for intellectual property rights.

1 Introduction

The advent of digitalization has ushered in a new civilization where transactions can be conducted remotely, obviating the necessity for face-to-face interactions. The advent of technology has not only facilitated ease of interaction but also engendered a plethora of economic opportunities. One may utilize marketplace sites as a digital market model for the purpose of conducting transactions as required, in either the capacity of a consumer or a vendor. The goods traded in the marketplace also encompass a diverse range, including daily

* Corresponding author: dimasasep13@gmail.com

necessities, luxury items, and antiques. The process of purchasing and selling literary works in the marketplace is not an unusual or complex undertaking.

In the contemporary era of global trade, the use of electronic transactions has become an inescapable aspect of modern business practice. Electronic commerce (E-Commerce) represents a significant advancement in information technology, whereby business transactions are no longer conducted in the traditional manner. This has eliminated the necessity for buyers to interact directly with sellers or to utilize cash. The seller, however, is represented by a system that serves buyers online through computer network media. In the course of a transaction, the buyer engages with and communicates to the system that represents the seller. Consequently, traditional brick-and-mortar stores are being supplanted by electronic stores (e-commerce), which are known by various names, including: Such establishments are variously known as "cyber stores," "virtual stores," "digital markets," "electronic malls," "online shops," and so forth. The expansion of this digital economy has both positive and negative implications for global economic activity, with the emergence of a borderless, globalized economy that transcends the traditional territorial boundaries of nation-states.[1]

The world of advertising has undergone a significant transformation, shifting away from traditional media platforms such as newspapers, magazines, and catalogs towards online advertising through social media and e-commerce sites. This is made possible by the interconnection of information technology with the global internet network, which offers a convenient platform for the marketing of products and services.[2] Prior to the marketing of a product via online media, it is essential to have an image that effectively displays or emphasizes the product in question. The presentation of a product photograph on the social media platform Instagram by a business actor serves to attract potential purchasers. This is the rationale behind the efforts of some businesspeople to create compelling product photos, with the objective of making the products they are promoting more attractive to the general public.

However, it is not uncommon for product images to be created and uploaded by other people or copyright owners, but then re-downloaded and uploaded by others who are not related to the original image owner. Such cases are common on Instagram and other e-commerce platforms. The creator/owner of the photo intentionally employs the use of product photography for the purpose of promoting their merchandise, thereby gaining economic benefits. However, other parties engage in the practice of "illegally" obtaining economic benefits through the use of other people's product photos. The creation of a superior product photograph necessitates a significant investment of resources, including financial costs, time, energy, and photographic expertise.[3] Cases of copyright infringement experienced by e-commerce @pmcollection.pku and @notyourcompany. Photos of their product catalogs are taken by other e-commerce that are not official resellers, distributors or dropshippers and then claimed as their own, thus harming the copyright owner. The lack of robust enforcement of copyright laws pertaining to business product images can be attributed to a complex interplay of factors, including deficiencies in law enforcement, lack of awareness among consumers, and the pursuit of profit by businesses. In this context, business actors are not solely limited to the role of sellers; marketplaces, too, bear responsibility for the selection of goods to be sold by their vendors. The act of photographing a product constitutes a violation of copyright.

Copyright is a component of IPR, IPR can be in the form of copyright; Patent; Exchange secrets; Trademark; franchise; Industrial design; License and Copyright; Layout / Topography of Integrated Circuits; Internet and Domain Names; also, Plant Varieties and Genetic Engineering. The protection of copyright in our country has been compiled through the 2014 Law No. 28 on Copyright but copyright infringement is still widely practiced in the Republic of Indonesia. The most common shortcomings of intellectual property law

regulations are the lack of protection for some types of intellectual property, multiple interpretations of legal norms, and weak regulation of technical documentation on intellectual property. [4]

Photographic works are considered to be objects protected by copyright. In the event that a photographer's work is uploaded for commercial purposes without the author's permission, the relevant legal provisions are set forth in Article 40, paragraph (1), letter k of the UUHC. In the event that a copyrighted work is utilized for commercial purposes, it is necessary to obtain the requisite permission. In accordance with the stipulations set forth in Articles 95 and 96 of the UUHC, the recourse available to those who have sustained damages as a result of copyright infringement is to seek compensation. Nevertheless, in practice, there are still numerous instances of copyright infringement involving photographic works, particularly in the form of product photos, where no compensation is sought.

2 Methodology

Data for this study were collected through library research, which involved references to laws, regulations, documents, books, and journal articles that were relevant to the research topic. This research uses normative research methods with legal and analytical approaches.[5] The primary legal material used is Law No. 28 of 2014 on Copyright. To obtain legal materials, the researcher collects data through a document study that includes laws and regulations, literature, and policies related to the research topic. The analysis of legal materials is conducted using a descriptive-analytical method, which aims to understand the content of the law and its impact on law enforcement in the context of copyright infringement of product information images in e-commerce. The results of the analysis are expected to identify the strengths and weaknesses of the existing regulations, as well as provide recommendations for policy improvements that are fairer and more effective in handling cases of copyright infringement of e-commerce product information images.

3 Results and Discussion

3.1 Copyright Infringement of Product Images in E-Commerce as A Manifestation of Fair Competition

Product images are of significant importance, particularly in the context of online marketing, as they serve to establish the identity of the product and the online shop itself. Copyright infringement occurs when a photographic work is created using a professional camera and efforts and ideas to improve the branding of an online shop, and the creator of the photographic work also holds the copyright. If the creator of the photographic work believes that their work has been used, published, or reproduced by someone who is not responsible and without prior permission, and that the original name of the creator has not been included, then this is a violation of copyright. Consequently, in the event that the creator believes their rights have been infringed, they may pursue legal action.

Intellectual Property Rights are defined as rights to wealth that arise from the fact that humans possess intellectual abilities. Intellectual Property Rights are classified into categories of intellectual rights, which facilitate the realization of intellectual works in various forms, including literature, technology, art, and knowledge. The creation of these works often necessitates significant investment of resources, including financial capital, time, energy, and determination and thought.[6] This concept posits that a variety of intellectual

works are of intrinsic value. If additional benefits from the economy can be utilized, it is necessary to consider the economic value of various intellectual works in order to develop a conception of wealth.

Intellectual property rights are classified into two principal categories: industrial property rights and copyright. The scope of copyright encompasses a multitude of copyrighted works, including those in the realms of art, science, and literature. Conversely, industrial property rights are manifested in the form of technology.[6] Copyright encompasses both moral and economic rights. In terms of economic rights, this pertains to the right to obtain benefits from the economy with regard to the rights and creations of related products. Conversely, moral rights are those that exist in the perpetrator and cannot be revoked, even in the event of the transfer of related copyright.[7]

The legal framework governing the use of photographic works uploaded for commercial purposes without the author's permission has been established through the enactment of Law Number 28 of 2014 concerning Copyright. Furthermore, Article 9, paragraph (3) of Law No. 28 of 2014 on Copyright also regulates the prohibition on reproducing or using a copyrighted work, including photographic works, for commercial purposes without the authorization of the creator or copyright holder.[8] "It is unlawful for any individual to reproduce and/or commercially utilize a copyrighted work without the authorization of the creator or copyright holder". Article 40, paragraph (1), letter k of Law Number 28 of 2014 Concerning Copyright states that photographic works are among the protected copyrighted works. It can thus be concluded that product photos are among the photographic works protected under Law Number 28 of 2014 Concerning Copyright.[9] Article 40, paragraph (3) establishes the protection of creations that have been or have not been announced but have been realized in a tangible form that allows for their duplication. The protection afforded to protected creations is subject to a defined period of validity. In the case of portraits and photographic works, this period is 50 years from the date of first announcement.

Infringement of the product photos occurs when any of the following actions are taken without the permission of the creator: taking, quoting, recording, reproducing, disseminating, or announcing any part or all of the product photos for commercial gain in an irresponsible manner. Such actions create the impression that society does not appreciate the copyrighted work of the creator and give the impression that the Indonesian state does not prioritize or enforce copyright laws effectively.

In the event of a copyright infringement, the legal consequences may include financial penalties and criminal sanctions, as outlined in Article 115 of Law No. 28 of 2014 on Copyright. This article states that "Any person who, without the consent of the person photographed or their heirs, makes commercial use, duplication, announcement, distribution, or communication of the portrait as referred to in Article 12 for the benefit of billboards or advertising for commercial use in both electronic and non-electronic media, shall be punished with a maximum fine of Rp.500,000,000." [8]

Copyright infringement frequently occurs when a creator's work is used without the requisite consent, thereby infringing upon the exclusive rights associated with the copyrighted material. A work may be deemed to have infringed copyright if there is a discernible degree of uniformity between two distinct creations. The copyright holder, that is to say the creator of the work, must be able to provide evidence that the work in question has been falsified or that other works have originated from it. Copyright infringement occurs when a substantial portion of a copyrighted work is reproduced.

In Indonesia, law enforcement officials may pursue legal action against those who infringe upon intellectual property rights in two distinct ways: through civil or criminal law. The process is as follows: individuals may file a lawsuit or complaint with a court or agency that specializes in IPR violations. The specific legal remedies that may be obtained are contingent upon the authority granted to judges by the applicable legislation. The typical

remedies include damages, a temporary injunction, or the destruction of infringing goods. Additionally, the state has the authority to compel individuals to comply with IPR regulations. The state is entitled to impose criminal sanctions on an individual who has violated the provisions of the law.[10]

In addition to sanctions imposed on online sellers who violate intellectual property law, copyright law also regulates sanctions for individuals engaged in various forms of commerce who facilitate the sale and/or duplication of goods from acts that violate copyright and/or related rights in the area of commerce. This is in accordance with Article 10, based on Article 114 of the copyright law, which stipulates that such individuals may be subject to a maximum fine of Rp.100,000,000.

In addition to other forms of intellectual property, such as industrial design, trademarks, patents, and trade secrets, copyright protection for photographs is particularly robust due to the high economic value these images possess for their creators. Consequently, in order to obtain the greatest possible profit, it is necessary to take action in relation to alternative possibilities, despite the fact that the act constitutes a violation of business ethics and moral norms. Nevertheless, it is still frequently carried out. In general, copyright infringement can be classified into two distinct categories: civil and criminal. In terms of criminal aspects, the elements in question violate the law and have an impact on the public interest. In contrast, civil violations entail harm to the copyright holder itself.[11]

In practice, copyright protection for photographic works remains relatively weak, as evidenced by the indicators observed within the legal protection framework in the Banda Aceh jurisdiction. In addition to registration, there is a need for confirmation, such as a watermark, which is applied immediately upon registration of the image copyright, minimising the occurrence of image copyright infringement, such as claims that images belong to other people. While copyright registration is not a mandatory requirement, it is nevertheless essential for creators to obtain protection for their works. This is because creators have certain economic rights, moral rights, and exclusive rights that must be safeguarded. In the event of a copyright infringement, the Directorate General of Intellectual Property Law may investigate the matter at the request of the copyright holder or creator. The objective of such an investigation is to safeguard the rights of the copyright owner.

In the absence of copyright infringement, a competitive business environment will flourish. Business competition has a beneficial effect on economic growth and business development. The presence of healthy competition encourages companies to engage in continuous innovation, enhance operational efficiency, and improve the quality of their products. Furthermore, healthy competition contributes to the establishment of a sustainable business ecosystem by encouraging companies to invest in environmentally friendly technologies and conduct ethical and socially responsible business practices. To ensure fair competition, it is essential to implement appropriate business strategies and practices. These include policies and regulations that promote fair competition, effective law enforcement, transparency in business processes, and the establishment of an ethical business culture. It is incumbent upon businesses to adhere to the tenets of ethical and responsible business conduct in all aspects of their operations.[12]

In order to establish fair competition, it is essential to implement business strategies and practices that promote fair competition, effective law enforcement, transparency in business processes, and the establishment of an ethical business culture. It is incumbent upon governments to establish policies and regulations that foster fair competition. In addition, businesses must pledge their commitment to upholding ethical and responsible business values.[12]

3.2 Copyright Protection in The Context of E-Commerce, With A View to Regulating the Use of Similar or Identical Images for Product Information

It is evident that legal protection is afforded to legal subjects through a multitude of regulatory frameworks. These laws are implemented in society, and their enforcement is backed by a range of legal instruments that serve both preventive and expressive functions. These instruments are both written and unwritten, collectively defining the role of law in providing justice, order, certainty, benefits, and peace.

In his argument, Philipus M. Hadjon posits that legal protection is the safeguard of human dignity and the recognition of human rights ascribed to legal subjects. This protection is founded upon legal provisions that serve to prevent arbitrary actions or to establish a system of rules that will protect one thing from another. In other words, the law offers protection for an individual's rights in the event that these rights are violated.[13]

In Indonesia, the legal certainty surrounding copyright protection is exemplified by the enactment of Law Number 28 of 2014 concerning Copyright. Meanwhile, the protection of creations on the internet is regulated by Article 25 of Law Number 11 of 2008, in conjunction with Law Number 19 of 2016 concerning Electronic Information and Transactions. The article elucidates that electronic information and/or electronic documents that are compiled into intellectual works, internet sites, and intellectual works contained therein are safeguarded as intellectual property rights in accordance with the stipulations of pertinent legislation.[14]

The preventive and repressive forms of legal protection are set forth in Law Number 28 of 2014 concerning Copyright. The aforementioned preventive form of legal protection is outlined in Article 9, which stipulates that the creator or copyright holder is entitled to grant or deny permission, respectively, to others without their consent to lease their work for commercial purposes.[8]

Repressive legal actions can be divided into two, namely through non-judicial channels and court channels.

a. Non-judicial channels

Arrangements regarding repressive legal action through the non-judicial track are regulated in Article 95, paragraph (4) of the Copyright Law. This article explains that: In addition to violations of copyright and/or related rights in the form of piracy, as long as the parties to the dispute are known to exist and/or are in the territory of the Unitary State of the Republic of Indonesia, the dispute must first be resolved through mediation before criminal charges can be filed.

In light of the aforementioned explanation, it is recommended that the conflicting parties pursue an out-of-court resolution to the dispute. The available methods for resolving disputes outside the court system can be classified into four principal categories: consultation, negotiation, mediation, and conciliation. In addition to the aforementioned methods, a settlement may also be reached through arbitration in the context of a copyright dispute. The primary advantage of the arbitration path is that it guarantees confidentiality, as it is conducted in private and the decision is not published to the general public.

b. Judicial channels

The resolution of disputes through the court system can be divided into two categories: civil suits and criminal charges. In instances of the commercialization of images on the internet without the consent of the creator, as outlined in Articles 96, 97, and 99 of the Copyright Law, the court with jurisdiction to hear the case is the Commercial Court. In the event of a loss of economic rights, the creator is entitled to file a lawsuit. In the event of criminal prosecution of the infringing party, the latter may be subject to sanctions in the form of imprisonment and/or fines. In the aforementioned case, the provisions of

Article 113, paragraph (3) may be applicable. This article pertains to the infringement of economic rights, specifically the right to distribution. The penalties for such an infringement are imprisonment for a maximum of four years and/or a maximum fine of Rp1,000,000,000.00 (one billion rupiah).

The form of protection afforded by a creator encompasses the conferral of both moral rights and economic rights. In the context of the Bern Convention, the term "moral rights" is used to refer to the rights associated with the creator. One of the moral rights of the creator is the prerogative to include or exclude their name from the creation. The economic rights set forth in Article 8 of the Copyright Law pertain to the creator's entitlement to derive economic benefits from their creation. One of the economic rights of the creator is the distribution right, as set forth in Article 9 of the Copyright Law. The distribution rights pertain to the sale, distribution, and/or dissemination of creations and/or related rights products.

Preventive protection is a form of protection that is implemented in order to prevent the occurrence of disputes or violations before they arise. In this case, the government provides protection for the copyright of photographic works for a period of 50 years from the date of initial publication. Nevertheless, it is imperative that creators register their works in order to substantiate their rights. This enables them to demonstrate that the creation is their own original work. While copyright is a right that arises automatically based on the declarative principle, with evidence in the form of a recording, the registration process provides a formal record that can be used to substantiate the creator's legal standing. Preventive legal protection is one of the objects of intellectual property that can be applied for in accordance with Minister of Law and Human Rights Regulation Number 42 of 2016, which pertains to copyright. Applications may be submitted via the official website of the Directorate General of Intellectual Property, accessible at www.dgip.go.id. The objective of the E-Copyright system is to facilitate the registration of creative works by the general public through an online platform that is accessible from any location and at any time. In contrast, repressive legal protection represents the ultimate recourse, comprising sanctions such as fines, imprisonment, and supplementary penalties imposed in the event of a dispute or an offence. In this restrictive legal framework, legal subjects are precluded from filing objections, as proceedings are conducted directly by administrative and general courts.

In order to prove copyright infringement on photographic works, it is necessary to demonstrate that the ownership of the work in question is indeed one's own and not the result of someone else. Furthermore, several similarities must be identified in order to prove the originality of the photo, thus establishing that it constitutes an infringement. There are multiple methods for establishing proof, including the resolution of the photograph, the raw file, the watermark, the type of camera used, and the name, date, and size on the photograph itself.

The creators and copyright holders are able to register their creations with the Directorate General of Intellectual Property Rights in order to obtain a Copyright Registration Letter. The copyright registration letter can be utilized as evidence of ownership and serves as one of the pieces of evidence presented to the investigator and considered by the judge in making a decision.[15]

In addition to delineating the subject of copyright protection and the rights associated with it, the Copyright Law also regulates the object of protection. Article 1, paragraph 3 of the Copyright Law elucidates that the object of copyright protection is a copyrighted work in the domains of science, literature, and art that has been manifested in a tangible form. Images on the Internet are included in the object of copyright protection on the grounds that, in accordance with Article 40, paragraph (1), they constitute a form of fine art. From the perspective of cyber law, the creations uploaded to the Internet are considered protected objects.[16] In accordance with Article 1 of the ITE Law, images on the internet are defined

as electronic information that can be comprehended by individuals with the requisite cognitive abilities.

Some of the provisions in Act No. 28 Year 2014, namely those pertaining to the subject of protection, the object of protection, the registration system, the term, copyright restrictions, and the interests of education and research, require adjustment (harmonization) with the advent of technological advancement to ensure legal certainty, justice, and expediency. The law is a heteronomous rule, meaning a rule that cannot stand alone because it regulates associations in society. Therefore, the rule of law must provide a balance between individual interests and the interests of society. Consequently, copyright is not merely a means of protecting the personal interests of the creator; it also serves a social function, benefiting the broader community.

4 Conclusion

In accordance with the provisions set forth in the Copyright Law, the utilization of images on the Internet without the requisite permissions for commercial purposes by unscrupulous parties constitutes an infringement of copyright. This is based on several provisions of the Copyright Act, which regulate the subject of protection, the object of protection, and restrictions on copyright. Copyright protection in e-commerce is necessary to regulate the use of similar or identical images for product information. Product images are considered creative works and are protected from the moment they are created. Under certain circumstances, the fair use doctrine allows images to be used without prior permission. Conversely, copyright infringement can result in legal action such as termination of the use of the image, monetary damages or penalties. International treaties also provide protection for intellectual property rights. Furthermore, international treaties offer intellectual copyright protection. In order to protect the copyright of published product photos, creators of photographic works have taken various measures, including issuing subpoenas, engaging in mediation, establishing compensation, and reporting instances of infringement to relevant institutions and agencies.

Those who have suffered harm as a result of the commercialization and utilization of works for which they do not hold the requisite rights may pursue legal recourse. In such cases, the legal action that can be taken is repressive legal action, both through court and non-court channels, in accordance with Article 95 and Article 96 of the Copyright Law. Furthermore, Instagram has established several alternative follow-up actions that can be taken by creators whose works are used by other parties without rights. Two factors impede the legal protection of online shop product photos used by others for commercial purposes. First, there is a lack of socialization from the government regarding the procedure for registering creations. Second, there is a lack of legal culture in society. The number of alternative legal actions that may be pursued by the aggrieved party. It is incumbent upon the creator to exercise due diligence in observing the procedural mechanics associated with each legal action they elect to pursue. Furthermore, creators must consider the advantages and disadvantages, as well as the efficacy, of the actions they undertake. Legislation needs to be reformulated to emphasize clearer procedures. For monitoring and enforcement, the government can work with digital platforms and develop tools such as the online watermark system.

References

- [1] V. U. & V. N. Estriana, “Analisa Strategi Ecommerce Indonesia dalam Penerapan Integrated Marketing Communication,” *Ilm. Fak. Ilmu Komput.*, vol. 9, no. 1, pp. 18–19, 2020.
- [2] Nurrahmah, “Konvergensi dari media konvensional ke digital,” *UIN Alauddin Makassar*, vol. 2, no. 1, p. 1, 2017.
- [3] O. S. Arum and H. Hadi, “Problematika Dalam Perlindungan Hak Cipta Atas Foto Produk Digital Pada Media Sosial Instagram,” *J. Priv. Law*, vol. 9, no. 2, pp. 269–280, 2021.
- [4] Z. Mingaleva and I. Mirskikh, “The Problems of Legal Regulation and Protection of Intellectual Property,” *Procedia - Soc. Behav. Sci.*, vol. 81, pp. 329–333, 2013.
- [5] J. Ibrahim, *Teori & Metodologi Penelitian Hukum Normatif*. Malang: Banyumedia Publishing, 2013.
- [6] I. Hariyani, *Prosedur mengurus HAKI yang benar*. Yogyakarta: Pustaka Yustisia, 2010.
- [7] E. Djaja, *Hukum Hak Kekayaan Intelektual*. Jakarta: Sinar Grafika, 2009.
- [8] Indonesia, “Undang-Undang Nomor 28 Tahun 2014 Tentang Hak Cipta,” no. 1, 2014.
- [9] I. W. Kusuma, I Gusti. Wiryawan, “AKIBAT HUKUM ATAS KARYA FOTOGRAFI YANG DIKOMERSIALISASIKAN TANPA IZIN DI MEDIA SOSIAL,” *Hari. Reg.*, p. 15, 2019.
- [10] E. E. Lindsey. Damian, *Hak Kekayaan Intelektual (Suatu Pengantar)*. Bandung: PT. Alumni, 2003.
- [11] H. Soelistyo, *Plagiarisme: Pelanggaran Hak Cipta dan Etika*. Yogyakarta: Kansius, 2011.
- [12] R. Y. A. I. Muhamad Rizki Sudrajat, Zulfahmi Hanifa, Jacobus Jopie Gilalo, “Persaingan usaha sehat dapat membangun ekosistem bisnis yang berkelanjutan 1,” *Karimah Tauhid, Vol. 2 Nomor 4 (2023), e-ISSN 2963-590X | Sudrajat al*, vol. 2, pp. 1041–1048, 2023.
- [13] P. M. Hadjon, *Perlindungan Hukum Bagi Rakyat Di Indonesia. Sebuah Studi Tentang Prinsip-Prinsipnya. Penanganan oleh Pengadilan dalam Lingkungan Peradilan Umum dan Pembentukan Peradilan Administrasi Negara*. Surabaya: PT. Bina Ilmu.
- [14] R. Indonesia, “Undang-Undang Republik Indonesia Nomor 19 Tahun 2016 Tentang Perubahan Atas Undang-Undang Nomor 11 Tahun 2008 Tentang Informasi Dan Transaksi Elektronik,” *UU No. 19 tahun 2016*, no. 1, pp. 1–31, 2016.
- [15] S. Margono, “Prinsip Deklaratif Pendaftaran Hak Cipta,” *Rechtsvinding*, vol. 1, no. 2, pp. 237–255, 2015.
- [16] S. Sudjana, “Sistem Perlindungan Atas Ciptaan Berdasarkan Undang-Undang Nomor 28 Tahun 2014 Tentang Hak Cipta Dalam Perspektif Cyber Law,” *Verit. Justitia*, vol. 2, no. 2, p. 253, 2016.