

# A Comparative Analysis of Artificial Intelligence Regulatory Law in Asia, Europe, and America

*Francisca Romana Nanik Alfiani*<sup>1,\*</sup>, Faisal Santiago<sup>2</sup>

<sup>1,2</sup>Doctor of Law, The Borobudur University, Jakarta, Indonesia

**Abstract.** This research aims to provide a comprehensive overview of the key considerations for formulating Artificial Intelligence (AI) regulations in Asia, Europe, and America. The study employs normative research, which in this context focuses on analyzing legal frameworks, principles, and regulations governing AI. Data collection techniques include the study of legal documents such as laws and regulations, along with a qualitative analysis using comparative methods. The result of research shown that technological advances are impacting human life at an unprecedented rate. AI has become integral to various sectors, transforming industries, fuelling innovation, and reshaping the way people live and work. However, the rapid rise of AI also raises significant moral, legal, and social concerns. In response, countries like China, Indonesia, the European Union, and the United States have enacted regulations to address these issues. The primary considerations in formulating these regulations include ethical principles, data privacy, algorithmic bias, transparency, explainability, and international collaboration. While the regulatory approaches differ across these regions, they share a common goal: ensuring that AI benefits society while minimizing negative impacts.

## 1 Introduction

Artificial Intelligence (AI) is changing how we live and work by enabling machines to perform tasks that usually require human intelligence, like learning and decision-making. The concept of AI was first introduced by pioneers Alan Turing[1] and John McCarthy in the 1950s. Turing explored whether machines could think in his paper "Computing Machinery and Intelligence," while McCarthy coined the term "Artificial Intelligence." [2] Since then, AI has grown beyond telecommunications to impact various industries, including banking, manufacturing, services, and government. While AI offers many benefits, it also raises ethical, legal, and social issues. For example, AI can create misleading content or lead to plagiarism through chatbots.[3] To address these challenges, countries like China, Indonesia, the European Union, and the United States have developed regulations to manage AI. The EU has introduced the General Data Protection Regulation (GDPR) and the AI Act. The US has put forward the Blueprint for an AI Bill of Rights. China has enacted the Cybersecurity Law and the New Generation Artificial Intelligence

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\*Corresponding Author: [ciscaromana@gmail.com](mailto:ciscaromana@gmail.com)

Development Plan. Indonesia has issued the Circular on Artificial Intelligence Ethics and the National Artificial Intelligence Strategy 2020-2045.

This research focuses on comparing AI regulations across Asia, Europe, and America, specifically in China, Indonesia, the European Union, and the United States. Each region has distinct principles and approaches to AI regulation. The study aims to develop legal theories related to AI, such as data protection, justice, legal responsibility, and algorithm ethics. These insights are intended to help shape future AI regulations and ensure that Indonesia's AI laws align with Pancasila values. Additionally, the research seeks to provide a reference for other countries, including Indonesia, in crafting their own AI regulations.

## **2 Method**

This research uses two main approaches, State Approach: Analyses AI regulations and frameworks in China, Indonesia, the European Union, and the United States. Comparative Approach: Compares AI regulations across these regions to understand different legal views and practices. The study uses a normative juridical method, focusing on Literature Review: Gathering and analyzing relevant theories, concepts, and regulations from books, journals, articles, and reports about AI laws. Examination: Looking at laws and regulations related to AI from the selected regions. Data is analysed using qualitative techniques: Identification: Finding key elements and themes in the data. Categorization: Organizing data into relevant groups. Interpretation: Understanding the meaning and implications of the data. Comparison: Assessing similarities and differences across the regions. The goal is to draw conclusions and provide insights into AI regulations and their development.

## **3 Discussion and Analysis**

Technological advancements, especially in artificial intelligence (AI), are changing our lives more rapidly than ever. AI is a major innovation with the potential to transform various aspects of human life, including business, creativity, and daily routines. It includes technologies like machine learning, natural language processing, and robotics. AI offers significant opportunities across different fields, Healthcare: AI helps diagnose diseases, predict treatment outcomes, and provide personalized care. Manufacturing: AI improves production efficiency and product quality. Transportation: AI develops autonomous cars to reduce accidents and traffic jams.[4] Despite its benefits, AI also raises ethical, legal, and social issues. It can impact jobs by automating tasks and poses risks to data privacy and security.

Concerns about AI's rapid evolution and potential dangers have led to the development of regulations in various regions: The European Union, The General Data Protection Regulation (GDPR) has improved data protection and transparency in AI, especially in healthcare, but has also introduced challenges for innovation and AI Act. China: AI regulations, especially in surveillance, help maintain state control but raise ethical concerns about privacy and human rights.[5] United States, The Blueprint for an AI Bill of Rights seeks to balance innovation and rights protection, though it faces criticism for being non-binding and relying on voluntary compliance.[6] Indonesia, The Indonesian National Artificial Intelligence Strategy 2020-2045 provides broad policy guidelines but lacks detailed regulatory provisions. These case studies illustrate that while regulations aim to mitigate risks and promote ethical AI use, their effectiveness often depends on the legal, cultural, and political contexts within each region.

### 3.1 AI Regulations in China: Balancing State Control and Technological Advancement

AI regulations in different countries often reflect each country's principles and ideologies. China, which adheres to communist principles, showcases a distinct approach to AI regulation. Under communist ideology, society is organized with collective ownership of resources and state-controlled production. The primary goal is to create a just and equal society, emphasizing collective well-being over individual rights.[7] This approach influences how artificial intelligence (AI) is regulated in China, with a strong focus on state control and social stability. China's government is often described as autocratic and socialist, and its legal framework reflects the principle of *fazhi* or *yifazhiguo*, which translates to "government based on law" or "governing the country according to law." [8] The Chinese legal system is a socialist legal system grounded in the civil law model, influenced by German civil law and traditional Chinese legal practices.

China's AI strategy is characterized by strong state involvement, integration with national policy goals, and a focus on using AI for social control and global influence. The approach reflects the broader goals of the Chinese government: to maintain domestic stability, enhance economic competitiveness, and increase its influence on the global stage.[9] While this strategy has enabled rapid advancements in AI, it also raises significant concerns about privacy, human rights, and the global implications of China's growing technological power.[10] China is proactive in addressing the ethical and safety concerns of AI development and use. The country's regulatory approach includes a range of laws and guidelines designed to manage and mitigate the risks associated with AI technologies. Key regulations include: [11]

- Cybersecurity Law (2016): This law strengthens state control over digital infrastructure and data protection, laying a foundation for how AI-related data is managed. It includes requirements for companies to secure data and ensure cybersecurity.
- New Generation Artificial Intelligence Development Plan (2017): This strategic plan outlines China's goals for AI development, aiming to make the country a global leader in AI innovation. It emphasizes research, development, and application, with a focus on creating a robust AI ecosystem.
- Administrative Provisions for Internet Information Service Algorithm Recommendation (2022): This regulation governs the use of recommendation algorithms by internet platforms, ensuring transparency and preventing the spread of harmful content.
- Shenzhen Special Economic Zone Artificial Intelligence Industry Promotion Regulations (2022): These regulations support AI development in Shenzhen, promoting innovation while establishing ethical guidelines for AI use.
- Provisions for the Implementation of Deep Synthesis Internet Information Service (2022): This provision regulates the use of deep synthesis technologies like deepfakes, ensuring responsible use and preventing misuse.
- Interim Measures for the Management of Generative Artificial Intelligence Services (2023): These measures provide guidelines for the ethical deployment of generative AI technologies, addressing issues of transparency and accountability.
- China's regulatory landscape may see further developments (2024). There is speculation that China might introduce a comprehensive AI Act, following the European Union's lead. This new legislation could provide a more detailed framework for managing AI's impact, offering greater control over how AI technologies are integrated into society.[12]

China's approach to AI regulation is deeply intertwined with its emphasis on state control and social stability. The extensive use of AI in surveillance and the Social Credit

System are prominent examples of how AI is integrated into national governance: Surveillance and Social Credit System: AI technologies, including facial recognition and AI-driven analytics, are employed in extensive surveillance operations. The Social Credit System scores citizens based on their behaviour, processing data from social media, financial transactions, and public surveillance. While this system is argued to enhance social order and public safety, it has faced criticism for privacy violations and excessive state control.[13]

### **3.1.1 The significant cases demonstrating the enforcement of its AI-related regulations.**

In recent months, China has seen several significant cases demonstrating the enforcement of its AI-related regulations.

- **AI-Generated Content and Copyright:** A landmark ruling in February 2024 by the Guangzhou Internet Court found an AI service provider liable for copyright infringement over AI-generated content. This case was particularly important because it was the first time a Chinese court ruled on the copyright status of AI-generated content, confirming that the creator of the AI model (not the AI itself) could be held accountable for copyright violations. The ruling followed the introduction of China's "Generative AI Measures," which regulate content produced by AI systems.
- **AI-Generated Deepfakes:** China has also imposed penalties on deepfake creators and distributors under new regulations targeting "deep synthesis technologies," including AI-generated deepfakes. These regulations require clear identifiers, such as watermarks, on AI-generated content to prevent disinformation and fraud. Violations can lead to fines and bans on business operations.

These cases underscore China's growing commitment to regulating AI by enforcing strict penalties for violations of copyright and misuse of AI technology, setting a precedent for future enforcement actions. Violations of AI regulations in China are typically resolved through a combination of legal actions, fines, and mandatory compliance measures. The resolution process depends on the nature and severity of the violation.

In extreme cases, violations may lead to court actions. For example, the Guangzhou Internet Court ruled on the first AI copyright infringement case, holding the AI service provider responsible for the illegal use of AI-generated content. In cases like this, legal rulings set important precedents and may involve compensation for damages or additional penalties. The companies involved in high-profile violations may face public criticism or blacklisting. In such instances, their reputations suffer, and they might find it difficult to secure future licenses or operate in certain sectors until they rebuild trust with regulators. These approaches ensure that AI regulations in China are enforced, driving compliance and accountability among AI developers and providers.

### **3.2 AI Regulation in Indonesia: Emerging Approaches and Challenges Pancasila and Indonesian Legal Framework**

Indonesia's legal system is deeply influenced by Pancasila, the foundational state ideology that consists of five principles: belief in one Almighty God; just and civilized humanity; the unity of Indonesia; democracy led by wisdom in deliberation and representation; and social justice for all Indonesian people.[14] These principles guide the nation's approach to governance, including the emerging field of artificial intelligence (AI).[15] Indonesia's legal framework is primarily based on civil law, emphasizing written statutes. Although there is no specific law directly regulating AI, several existing regulations touch upon aspects relevant to AI:

- Information and Electronic Transactions Law (Law No. 11 of 2008) and its Amendments: This law governs electronic transactions and provides a framework for managing digital interactions.
- Government Regulation No. 71 of 2019: This regulation concerns the implementation of electronic systems and aims to provide legal clarity for digital processes.
- Personal Data Protection Law: This law, effective from 2022, regulates the processing of personal data, which is crucial for AI systems overseeing sensitive information.
- Minister of Communication and Information Regulation No. 3 of 2021: This regulation addresses licensing aspects for businesses utilizing AI.

In 2020, Indonesia introduced the National Artificial Intelligence Strategy (Stranas AI), outlining policies for AI ethics, talent development, and infrastructure. Stranas AI serves as a policy direction rather than a binding legal document. Following this, the Artificial Intelligence Research and Innovation Collaboration (KORIKA) was established in 2021 to further AI research and development.[16] In December 2023, the Ministry of Communication and Informatics issued ethical guidelines for AI use through Minister of Communication and Information Circular No. 9 of 2023. This Circular sets out ethical principles for AI development and application, focusing on data privacy, security, transparency, and the social impact of AI technology. However, since these guidelines are non-binding, their implementation and adherence vary across sectors. Deputy Minister of Communication and Information Nezar Patria has indicated plans to introduce presidential and ministerial regulations to establish a more formal regulatory framework for AI. These regulations are expected to be completed before the end of the current government regime.

### **3.2.1 The significant cases demonstrating the enforcement of its AI-related regulations.**

Indonesia does not yet have specific regulations for Artificial Intelligence (AI), but several existing laws address AI-related issues:

- Data Privacy Violations: In 2020, Indonesia's Ministry of Communication and Information Technology fined companies for mishandling personal data. This relates to AI because AI systems often use large datasets. The relevant law is the Personal Data Protection Law (PDP Law), which highlights the importance of protecting personal data in AI systems.
- Social Media Content Regulation: In 2022, the government acted against social media platforms for not removing harmful content quickly enough. Since these platforms use AI for content moderation, this enforcement under Ministerial Regulation No. 5 of 2020 affects how AI is used for managing online content.
- E-commerce and Consumer Protection: The Indonesian Consumer Protection Agency has addressed unfair practices by e-commerce platforms, which use AI for pricing and recommendations. The relevant laws are the Consumer Protection Law and E-commerce Regulation, emphasizing fair and transparent AI practices in online shopping.
- Automated Decision-Making Systems: Financial institutions in Indonesia have faced scrutiny over the fairness of their AI systems. The Financial Services Authority (OJK) regulations ensure that AI in finance operates fairly and transparently.

These cases show that while specific AI regulations are still developing, existing laws are being enforced in ways that impact AI practices, ensuring that technologies are used responsibly.

### **3.3 AI Regulation in the European Union: Balancing Innovation with Ethical Principles**

The European Union, which is a collection of 27 countries on the European continent, has four main principles derived from the European Union Treaty, which was amended in the Amsterdam Treaty: freedom, democracy, respect for human rights and individual freedoms, and the supremacy of law. The development of the use of AI in the European Union (EU) varies greatly depending on the country, but generally prioritizes the values of freedom, democracy, and human rights, as well as the use of AI in The EU which is regulated by strict regulations, ensuring that AI is used in accordance with the law and is protected by the legal system.[17] The EU's approach to AI regulation is risk-based and balanced, providing measurable flexibility for the development and advancement of AI. It's like letting go of the head while still holding the tail. If the head has the potential to hit, then the tail is pulled. The legal system in the European Union is the same as in Indonesia, namely civil law.

The EU passed the AI Act on May 21, 2024. The AI Act is a comprehensive regulation specifically targeting AI. It classifies AI systems by risk levels and sets requirements for high-risk applications. Classification of AI systems into high-risk, limited risk, low-risk, and non-risk categories. Prohibition of certain harmful AI practices, such as mass surveillance and manipulative AI. Transparency obligations and accountability for AI developers and users. Oversight by the European Commission to enforce compliance.

#### **3.3.1 The Other Regulation Relate AI di The European Union**

There are some additional AI regulations and initiatives in the EU that reflect its approach to managing the development and use of AI and the stance on AI, aiming to ensure that technological advancements are balanced with protections for individuals and society.[18]

- General Data Protection Regulation (GDPR). Enforced since May 2018, GDPR is a broad data protection regulation that affects how AI systems handle personal data. It mandates transparency, consent, and the right to access personal data, which impacts AI systems that process or analyse such data.
- Digital Services Act (DSA). Adopted in 2022, the DSA regulates digital platforms, including those using AI. It focuses on content moderation, transparency, and accountability, aiming to reduce the spread of harmful content and misinformation.
- Digital Markets Act (DMA). Also enacted in 2022, the DMA addresses competition in digital markets, particularly targeting "gatekeeper" platforms that use AI to control access to their services.
- The EU Cybersecurity Strategy. Aimed at enhancing the security of digital infrastructure, including AI systems. The strategy includes measures to protect against cyber threats and ensure the resilience of AI technologies.

#### **3.3.2 The significant cases demonstrating the enforcement of its AI-related regulations.**

There have been notable cases related to AI in the EU, particularly as the EU strengthens its regulatory framework for AI.

- Deepfake Videos and Misinformation. The EU has addressed concerns about deepfake technology and misinformation spread through AI-generated content. In 2021, the European Commission acted against platforms that failed to tackle deepfakes and fake news effectively. Outcome: The EU's Digital Services Act (DSA), enacted in 2022,

requires platforms to implement measures against harmful misinformation, including AI-generated deepfakes. The regulation emphasizes transparency and accountability in how platforms manage content.

- Facial Recognition and Privacy. In 2020, the European Data Protection Supervisor (EDPS) raised concerns about the use of facial recognition technology by law enforcement. The technology was being used for public surveillance and was seen as a potential invasion of privacy. Outcome: The EU's AI Act includes provisions that ban real-time facial recognition in public spaces to prevent mass surveillance and protect privacy.
- AI in Hiring Practices. Several companies faced scrutiny for using AI in hiring processes, which led to claims of discrimination. The EU's General Data Protection Regulation (GDPR) and other regulations scrutinized how AI systems made decisions about job candidates. Outcome: The AI Act addresses these issues by setting standards for transparency and fairness in AI-driven recruitment, requiring companies to disclose how AI systems make decisions and ensure they are free from bias.
- AI in Healthcare. The European Medicines Agency (EMA) examined the use of AI in drug discovery and clinical trials. Concerns were raised about the accuracy and reliability of AI systems used in these critical areas. Outcome: The AI Act includes rigorous requirements for high-risk AI systems, such as those used in healthcare, mandating thorough assessments and compliance with strict standards to ensure safety and efficacy.
- AI and Consumer Protection. The European Consumer Organisation (BEUC) investigated the use of AI in consumer goods and services, including issues related to transparency and fairness in automated systems. Outcome: The AI Act imposes transparency requirements on AI systems, ensuring that consumers are informed about AI usage and its impact on their decisions.

These cases illustrate the EU's commitment to regulating AI effectively to balance innovation with protection for individuals and society. The EU's legal framework aims to address various concerns related to AI, from privacy and discrimination to transparency and accountability

### **3.4 AI Regulation in the United States: Balancing Innovation and Ethics**

Liberalism is a core tenet of the United States, with freedom and individual rights as foundational principles. The American Creed, articulated by William Tyler Page (1817), emphasizes allegiance to constitutional values and a shared national vision. This creed underpins the nation's approach to artificial intelligence (AI), which reflects the country's commitment to innovation, individual freedom, and minimal government intervention. The U.S. legal system, rooted in common law, relies heavily on judicial precedents and societal customs.

#### **3.4.1 Regulatory Landscape for AI in the United States**

Despite its tradition of minimal regulation, the U.S. has made notable strides in addressing the ethical and societal implications of AI. Recent developments indicate a growing focus on responsible AI use, while balancing the need to foster innovation. Key regulatory initiatives include:

- Artificial Intelligence Risk Management Framework (AI RMF 1.0): Released by the National Institute of Standards and Technology (NIST AI RMF 1.0) in January 2023, this framework provides guidelines for managing AI-related risks. It emphasizes

transparency, accountability, and risk management to ensure that AI technologies are developed and deployed responsibly.

- **Blueprint for an AI Bill of Rights.** Outlines five principles to protect individual rights and ensure ethical AI use: Protection from Harm: Preventing harm from AI systems. Privacy: Safeguarding personal data and ensuring transparency. Non-Discrimination: Avoiding biases and ensuring fairness. Explainability: Providing clear explanations for AI decisions. Accountability: Holding developers and users accountable.
- **AI Policies and Regulations.** The 2024 AI Index report notes 25 new AI regulations introduced in 2023, focusing on ethical development and use.

### **3.4.2 The significant cases demonstrating the enforcement of its AI-related regulations**

There have been several notable AI cases and developments in the United States that highlight both the potential and challenges of AI:

- **Amazon's AI Recruitment Tool.** Amazon faced criticism for an AI tool used to screen job applications. The tool was found to favour male candidates over female candidates due to biases in the training data. Outcome: Amazon scrapped the tool in 2018.[19] This case highlighted the need for fairness and transparency in AI-driven hiring processes.
- **COMPAS Recidivism Risk Assessment.** The COMPAS algorithm is used in several states to assess the risk of recidivism among criminals. It faced scrutiny for allegedly being biased against African American defendants. Outcome: The case raised concerns about fairness and transparency in AI systems used in the criminal justice system. It led to discussions about the need for better oversight and the potential for AI systems to reinforce existing biases.[20]
- **Clearview AI and Privacy.** Clearview AI, a company that developed a facial recognition tool, faced legal challenges for scraping images from social media platforms to train its AI system without consent. Outcome: Several social media companies, including Facebook and Twitter, sent cease-and-desist letters to Clearview AI.[21] This case emphasized privacy concerns and the need for regulations around data usage and consent.
- **Google's AI and Search Results Bias.** Google's search algorithms were criticized for promoting biased or harmful content. Concerns were raised about how AI systems influence the information users see and the potential for reinforcing stereotypes. Outcome: Google faced calls for greater transparency and accountability in its algorithms.[22] This case underscored the need for ethical considerations in AI system design and deployment.
- **AI in Healthcare - IBM Watson for Oncology.** Case: IBM Watson for Oncology, an AI system designed to assist with cancer treatment recommendations, faced criticism for providing inaccurate recommendations based on training data. Outcome: This case led to questions about the reliability of AI in critical applications and the need for rigorous validation and oversight.[23]

These cases illustrate the complex interplay between AI technology and societal concerns, including bias, privacy, transparency, and accountability. They also highlight ongoing efforts to address these challenges through regulations, guidelines, and public scrutiny.

## **4 Conclusion**

The AI regulatory models in China, Indonesia, the EU, and the US differ due to each region's distinct principles and legal systems. While the EU adopts a comprehensive and



preventive approach, China, Indonesia, and the US follow more reactive and fragmented strategies. However, all frameworks share core principles, such as ethics, data privacy, algorithmic transparency, bias mitigation, explainability, and international cooperation:

- China's state-controlled approach focuses on balancing social stability with individual freedoms. Regulations like the AI Act and data protection laws aim to maximize AI's benefits while addressing ethical concerns and maintaining strict oversight.
- Indonesia: Indonesia's evolving strategy attempts to align AI development with Pancasila values. While lacking a comprehensive framework, initiatives like STRANAS AI and ethical guidelines show progress toward responsible AI governance.
- The European Union's AI Act and GDPR emphasize stringent data protection and transparency, striking a balance between innovation and ethical considerations. For instance, GDPR's impact on AI in healthcare, particularly in Germany, highlights both the protective benefits and the challenges of ensuring privacy while encouraging technological growth.
- The United States emphasizes innovation, with fewer regulatory constraints compared to Europe and China. Initiatives like the Blueprint for an AI Bill of Rights and the AI Risk Management Framework aim to foster ethical AI usage while promoting a free-market, innovation-driven environment.

These principles guide global AI regulation, ensuring responsible development while maximizing benefits and minimizing risks. As AI evolves, regulations will continue to adapt to address emerging challenges and opportunities.

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