

FINANCIAL SERVICES AUTHORITY OF THE REPUBLIC OF INDONESIA

COPY FINANCIAL SERVICES AUTHORITY REGULATION NUMBER:1/POJK.07/2013 CONCERNING CONSUMER PROTECTION IN FINANCIAL SERVICES SECTOR

WITH THE BLESSING OF ALMIGHTY GOD THE BOARD OF COMMISSIONERS OF THE FINANCIAL SERVICES AUTHORITY,

Considering

whereas to implement the provision of Article 31 of Law Number 21 Year 2011 regarding the Financial Service Authority, it is necessary to issue the Financial Service Authority Regulation Concerning Consumer Protection in the Financial Service Sector;

In view of

Law Number 21 Year 2011 regarding the Financial Service Authority (State Gazette of the Republic of Indonesia Year 2011 Number 111; Supplement to State Gazette of the Republic of Indonesia Number 5253);

HAS DECIDED:

To enact

FINANCIAL SERVICE AUTHORITY REGULATION CONCERNING CONSUMER PROTECTION IN FINANCIAL SERVICE SECTOR.

CHAPTER I GENERAL PROVISIONS

In this Financial Service Authority Regulation, the meaning of:

- 1. Financial Services Providers are Commercial Banks, Rural Banks, Securities Companies, Investment Advisors, Custodian Banks, Pension Funds, Insurance Companies, Reinsurance Companies, Multifinance Institution, Pawn Companies and Guarantee Companies, which conduct their business operations under conventional and sharia arrangement.
- 2. Consumers are parties that put their funds and/or utilize the services available at the Financial Services Institutions, including banking customers, capital market investors, insurance policyholders, and Pension Fund participants, based on the laws and regulations in financial services sector.
- 3. Consumer Protection is the protection to the Consumers which covers the behaviour of the Financial Services Providers.
- 4. Commercial Banks are banks which carry out their business activities on conventional basis and or based on Sharia Principle, which in their activities provide the services in payment transfers.
- 5. People's credit union banks are banks which carry out their business activities on conventional basis or based on Sharia Principle, which in their activities do not provide the services in payment transfers.
- 6. Securities Companies are the parties which carry out business activities as Securities Underwriters, Securities Brokers and or Investment Managers.
- 7. Securities Underwriters are the Parties which make contracts with the Issuers to make Public Offers for the interest of the Issuers with or without the obligation to buy the unsold Securities.
- 8. Securities Brokers are the Parties which sell and buy securities for

their own account or the accounts of another Party.

- 9. Investment the **Parties** whose business Managers are manage Securities Portfolio for their customers or activities manage collective investment portfolios for of a group customers, except insurance companies, pension funds, and banks which carry out their business activities based on the prevailing law and regulations.
- 10. Investment Advisors are the Parties which provide advises to other Parties regarding Securities sales or purchases and obtain payments for their services.
- 11. Custodian Banks are Commercial Banks which provide custodian services for Securities and other assets related to Securities and other services, including to receive dividend, interest and other rights, settle Securities transactions and represent the account holders who are their customers.
- 12. General Insurance Company is insurance company which provide services against loss risk, loss of benefits, and legal accountability to third parties, incurred from uncertain events.
- 13. Life Insurance Company is insurance company which provide services against risk related to the life or death of an insured person.
- 14. Pension Funds are legal entities which manage and carry out programs which provide pension benefits.
- 15. Multifinance Companies are business entities which carry out financing activities in the forms of the provision of funds or capital goods as referred to in the law and regulations regarding finance companies.
- 16. Pawn Companies are business entities established to provide loan to customers by accepting movable goods as securities.

17. Guarantee Companies are legal entities involved in financial sector with the main business activities of providing guarantees.

Article 2

Consumer Protection implements the principles of:

- a. transparency;
- b. fair treatment;
- c. reliability;
- d. confidentiality and security of Consumer data/information; and
- e. handling of complaints and settlement of Consumer dispute in a simple, fast manner and at reasonable cost.

CHAPTER II

CONSUMER PROTECTION PROVISION IN THE FINANCIAL SERVICES SECTOR

Article 3

The Financial Services Providers are entitled to ensure that the Consumers have good faith and receive information and/or documents regarding the Consumers which are accurate, honest, clear and not misleading.

- (1) The Financial Services Providers have to provide and/ordeliver information regarding the products and/or services which are accurate, honest, clear and not misleading.
- (2) The information as referred to in paragraph (1) is written in a document or other means which can be used as evidence.
- (3) The information as referred to in paragraph (1) shall be:
 - a. delivered when giving an explanation to the Consumers regarding their rights and obligations;
 - b. delivered when making an agreement with the Consumers; and

c. stated when being delivered by various media such as by advertisement in print or electronic media.

Article 5

The Financial Services Providers have to submit updated information and easily accessible to Consumers regarding their products and/or services.

Article 6

- (1) the Financial Services Providers have to submit information to the Consumers regarding the receipt, suspension or rejection of an application of a product and/or service.
- (2) In the case the Financial Services Business Communities sends information regarding the suspension or rejection of an application of a product and/or service as referred to in paragraph (1), the Financial Services Providers has to give the reason for the suspension or rejection unless otherwise regulated by the law and regulations.

- (1) The Financial Services Providers have to use simple terms, phrases and/or sentences in Indonesian language which can be easily understood by Consumers in each document which:
 - a. contains the Consumers' rights and obligations;
 - b. can be used by the Consumers to make decisions; and
 - c. contain the terms and can legally bind the Consumers.
- (2) The Indonesian language in the documents as referred to in paragraph (1) can be presented together with another language if necessary.
- (3) The Financial Services Business Communities have to use

- letters, writing, symbols, diagrams and marks which can be clearly read.
- (4) The Financial Services Providers have to give explanation regarding the terms, phrases, sentences and/or symbols, diagrams and marks which have not been understood by the Consumers.
- (5) In the case the documents as referred to in paragraph (1) based on the provisions of the law and regulations are in a foreign language, the respective foreign language has to be presented together with the Indonesian language.

- (1) The Financial Services Business Communities has to prepare and provide summaries of the information on the products and/or services.
- (2) The summary of the information of the products and/or services as referred to in paragraph (1) shall be given in writing, minimum containing:
 - a. benefits, risks, and costs of the products and/or services; and
 - b. terms and conditions.

Article 9

The Financial Services Providers have to provide an understanding to the Consumers regarding the Consumers' rights and obligations.

- (1) The Financial Services Providers have to give information regarding the costs to be borne by the Consumers for each product and/or service provided by The Financial Services Providers.
- (2) The Financial Services Providers are prohibited to provide automatic facilities causing additional costs without a written approval from the Consumers.

- (1) Before a Consumer signs a document and/or an agreement regarding a product and/or service, the Financial Services Business Communities has to deliver the documents containing the terms and conditions of the product and/or service to the Consumer.
- (2) The terms and conditions of the product and/or service as referred to in paragraph (1) minimum contain:
 - a. details of the costs, benefits and risks; and
 - b. procedure of the service and settlement of compliant at the Financial Service Business Operators.

- (1) The Financial Services Providers have to inform the Consumers of every change of the benefits, costs, risks, terms and conditions stated in the documents and/or agreements regarding the products and/or services of the Financial Service Business Operators.
- (2) The information as referred to in paragraph (1) has to be advised to the Consumers at the latest 30 (thirty) business days before the change of the benefits, costs, risks, terms and conditions of the products and/or services of the Financial Service Business Operators becomes effective.
- (3) In the case the Consumer does not agree to the change of the terms of the products and/or services as referred to in paragraph(1), the Consumer is entitled to terminate the products and/or services without any compensation.
- (4) In the case the Consumers have been given time to submit their opinion as referred to in paragraph (2) and the Consumers do not give their opinion, The Financial Services Providers consider the Consumers to have agreed to such change.

The Financial Services Providers have to prepare guidelines regarding the decision of the costs or prices of the financial service products and/or services.

Article 14

- (1) The Financial Services Providers have to provide education in the framework of improving the financial literacy to the Consumers and/or public.
- (2) The plan for the education as referred to in paragraph (1) has to be prepared in an annual program and reported to the Financial Services Authority.
- (3) Further provision regarding the reports of the plan for the education as referred to in paragraph (2) shall be regulated in a Financial Services Authority Circular Letter.

- (1) The Financial Services Providers have to provide equal access to each Consumer according to the Consumer classification of the products and/or services of the Financial Service Business Operators.
- (2) The Consumer classification as referred to in paragraph (1) can be determined by The Financial Services Business based on:
 - (a) consumer background;
 - (b) information regarding occupation;
 - (c) average income;
 - (d) purpose and objective of using the products and/or services of the Financial Service Business Operators; or
 - (e) other information used to decide the Consumer classification.

The Financial Service Business Operators have to consider the appropriateness of the need and capability of the Consumers to the products and/or services offered to the Consumers.

Article 17

The Financial Services Providers are prohibited to use marketing strategy of the products and/or services which can harm the Consumers by taking advantage of the Consumers' condition which does not have other choice when making a decision.

Article 18

- (1) The Financial Services Providers can sell products and/or services in one package with another product and/or service (bundling product/service).
- (2) In the case the Financial Services Business Communities sell products and/or services as referred to in paragraph (1):
 - a. The Financial Services Business Communities are prohibited to force Consumers to buy other products and/or services in the respective package of products and/or services; and
 - b. The Consumers may choose other provider of the product and/or service in the respective package of products and/or services.
- (3) In the case the products and/or services in the package of the products and/or services offered are the choice of the Consumers, the risks of such choice is the responsibility of the Consumers.

Article 19

The Financial Services Business Communities are prohibited to offer products and/or services to Consumers and/or public via personal means of communication without the approval of the Consumers.

- (1) The Financial Services Providers have to state and/or mention in each offer or promotion of products and/or services:
 - a. name and/or logo of The Financial Services Providers; and
 - b. statement that The Financial Services Providers is registered and supervised by the Financial Services Authority.
- (2) In the case the sales of the products and/or services can only be done by individuals listed at the Financial Services Authority, the offer or promotion as referred to in paragraph (1) has to contain a statement that the respective individuals are listed and supervised by the Financial Services Authority.

Article 21

The Financial Services Providers have to meet the balance, fairness and reasonableness in making the agreement with the Consumers.

- (1) In the case The Financial Services Providers use standard agreements, such standard agreement have to be prepared according to the law and regulations.
- (2) The standard agreements as referred to in paragraph (1) can be in the forms of digital or electronic to be offered by The Financial Services Providers via electronic media.
- (3) The standard agreements as referred to in paragraph (2) which are used by The Financial Services Providers are prohibited to:
 - a. state a transfer of responsibilities or obligations of the Financial Services Providers to the Consumers;
 - state that the Financial Services Business Communities are entitled to refuse to refund the money already paid by the Consumer for the products and/or services bought;
 - c. state the issuance of the authority from the Consumers to The

Financial Services Providers, directly or indirectly, to take all actions unilaterally on the goods pledged by the Consumers, unless such unilateral actions are done based on the law and regulations;

- d. regulate the obligation of evidence by the Consumers, if the Financial Services Business Communities declare that the lost of the use of the products and/or services bought by the Consumers is not the responsibility of The Financial Services Providers;
- e. give right to The Financial Services Providers to reduce the use
 of the products and/or authority or reduce the assets of
 the Consumers which are the object of the product and service
 agreement;
- f. state that the Consumers shall abide by new, additional, advanced and/or amended rules issued unilaterally by the Financial Services Business Communities during the period the Consumers are taking advantage of the products and/or services they bought; and/or
- g. state that the Consumers give authority to the Financial Services Business Communities to place mortgage, pledge or place security interest on the products and/or services bought by Consumers on installment.

- (1) The Financial Services Providers, selling agents, and management/employees of the Financial Service Business Operators have to prevent a conflict of interest between the Financial Services Providers and the Consumers.
- (2) The Financial Services Business Communities have to provide information regarding a conflict of interest or a potential conflict of interest.

The Financial Services Business Communities have to provide special services to Consumers with special needs.

Article 25

The Financial Services Providers shall have to maintain the security of the deposits, funds or assets of the Consumers under the responsibility of The Financial Services Providers.

Article 26

The Financial Services Providers have to issue a receipt of the ownership of products and/or use of services to the Consumers on timely basis according to the agreement with the Consumers.

Article 27

The Financial Services Providers have to send reports to the Consumers regarding the balance position and deposit movements, funds, assets, or liabilities of the Consumers accurately, on timely basis and in the manners or means according to the agreement with the Consumers.

Article 28

The Financial Services Business Communities have to carry out the Consumers instructions according to the agreements with the Consumers and the law and regulations.

Article 29

The Financial Services Providers have to be responsible for the loss of the Consumers arising from the error and/or negligence of the management,

employees of The Financial Services Providers and/or third parties working for the interest of the Financial Service Business Operators.

Article 30

- (1) The Financial Services Providers have to prevent their management, supervisors and employees from the behaviour to:
 - a. enrich or benefit themselves or another party,
 - b. misuse the authority, opportunity or means available to them due to their office or position, which can harm Consumers.
- (2) The management and employees of The Financial Services
 Providers have to abide by the code of ethics in serving the
 Consumers as determined by each Financial Services Providers.
- (3) The Financial Services Business Communities have to be responsible to the Consumers for the actions done by third parties acting for the interest of The Financial Services Providers.

- (1) The Financial Services Providers are prohibited in any way to give data and/or information regarding their Consumers to a third party.
- (2) The prohibition as referred to in paragraph (1) is exempted in the case:
 - a. the Consumers have given a written approval; and/or
 - b. required by the law and regulations.
- (3) In the case The Financial Services Providers receive personal data and/or information regarding an individual and/or a group of individuals from another party and the Financial Services Business Communities intend to use such data and/or information to carry out their activities, the Financial Services Business Communities have to receive a written statement that the respective other party has received a written approval from

the respective individuals and/or group of individuals to give such personal data and/or information to any party, including to The Financial Services Providers.

(4) A cancellation or amendment of part of an approval for the disclosure of the data or information as referred to in paragraph (2) letter a is done in writing by the Consumers in the form of a statement.

Article 32

- (1) The Financial Services Providers required to have and carry out the mechanism of the service and settlement of complaints for the Consumers.
- (2) The mechanism of the service and settlement of the complaints as referred to in paragraph (1) have to be notified to the Consumers.

Article 33

The Financial Services Providers are prohibited to charge any fees to the Consumers for the filing of a complaint.

- (1) The Financial Services Business Communities have to report periodically the Consumer complaints and the follow-up of the service and settlement of the respective Consumer complaints to the Financial Services Authority, in this case to the Chief Executive who supervises the activities of The Financial Services Providers.
- (2) The reports as referred to in paragraph (1) are submitted at the latest on the 10 (tenth) every 3 (three) months. If the 10 (tenth) falls on a holiday, the report submission is to be done on the first business day after the respective holiday.

- (1) The Financial Services Providers have to immediately follow-up and settle a complaint at the latest 20 business days after the date of the receipt of the complaint.
- (2) In the case of a certain condition, The Financial Services Providers can extend the period maximum until the following 20 business days.
- (3) The certain conditions as referred to in paragraph (2) are:
 - a. the office of The Financial Services Providers receiving the complaint is not the same as the office of The Financial Services Business Communities where the issue occurs and there is a communication constraint between the two offices of The Financial Services Providers;

- the financial transaction complained by the Consumer requires special checking of the documents of the Financial Services Providers; and/or
- c. there are other matters beyond the control of the Financial Services Business Communities such as the involvement of a third party outside The Financial Services Providers in the financial transaction complained by the Consumer.
- (4) The extension of the period for the settlement of the complaint as referred to in paragraph (2) has to be notified in writing to the Consumer making the complaint before the period as referred to in paragraph (1) expires.

- (1) The Financial Services Providers required to have a business unit and/or a function to handle and settle the complaints filed by the Consumers.
- (2) The authority of the business unit and/or function as referred to in paragraph (1) has to be regulated in the mechanism of the service and settlement of the complaint as referred to in Article 32.
- (3) The Financial Services Providers have to appoint 1 (one) employee in each office of the Financial Service Business Operators to handle the settlement of Consumer's complaint.

Article 37

In the case the Consumer complaint is related to a transaction or activity involving an employee of The Financial Services Providers with the authority to handle complaints or an employee of The Financial Services Providers who settles such complaint, the handling and settlement of the complaint have to be done by another employee.

After receiving a Consumer complaint, The Financial Services Providers has to:

- a. check internally the complaint in a competent, correct and objective manners;
- b. analyse to ensure the correctness of the complaint; and
- c. submit an apology and offer a compensation (redress/remedy) or correctness of the product and or service, if the Consumer complaint is correct.

Article 39

- (1) In the case there is not any agreement regarding the settlement of the complaint, the Consumer can settle the dispute outside or in the court of law.
- (2) The settlement of a dispute outside the court as referred to in paragraph (1) is done via an alternative dispute resolution institution.
- (3) In the case the settlement of the dispute is not done via the alternative dispute resolution institution as referred to in paragraph (2), the Consumer can submit an application to the Financial Services Authority to facilitate the settlement of the complaint of the Consumer harmed by The Financial Services Providers.

CHAPTER III

CONSUMER COMPLAINT AND GRANTING OF A FACILITY FOR THE SETTLEMENT OF A COMPLAINT BY THE FINANCIAL SERVICES AUTHORITY

Article 40

(1) A Consumer can file a complaint indicated as a dispute between a
The Financial Services Providers and the Consumer to the
Financial Services Authority.

- (2) The Consumer and/or public can submit a complaint indicated as a violation of the law and regulations in the financial service sector to the Financial Services Authority.
- (3) The complaints as referred to in paragraph (1) and paragraph (2) are submitted to the Financial Services Authority, in this case a Member of the Board of Commissioners supervising Consumer education and protection.

The granting of the facility for the settlement of Consumer complaint by the Financial Services Authority is given to complaints indicated as dispute in the financial services sector as referred to in Article 40 paragraph (1) and which fulfils the following conditions:

- a. the Consumer suffers a financial loss caused by:
 - 1. The Financial Service Business Operators in the sectors of Banking, Capital Market, Pension Funds, Life Insurance Company, Multifinance Company, Pawn Companies or Guarantee Companies, maximum IDR 500,000,000 (five hundred million rupiah);
 - 2. The Financial Service Business Operators in general insurance Company is maximum IDR 750,000,000 (seven hundred and fifty million rupiah);
- b. the Consumer submits a written application accompanied by the supporting documents related to the complaint;
- c. the Financial Services Providers has make efforts to settle the complaint but the Consumer cannot accept such settlement or has passed the period as determined in this Financial Services Authority Regulation;
- d. the complaint submitted is not a dispute in process or has been decided by an arbitration institution or court, or other mediation institution;
- e. the complaint submitted is of civil nature;

- f. the complaint submitted has never been facilitated by the Financial Services Authority; and
- g. the submission of the settlement of the complaint does not exceed 60 (sixty) business days after the date of the settlement of the Compliant issued by The Financial Services Providers to the Consumer.

The provision of the facility for the settlement of complaint given by the Financial Services Authority as referred to in Article 41 is the efforts to bring together the Consumer and The Financial Services Providers to review the issue basically in the framework of obtaining an agreement for a settlement.

Article 43

The Financial Services Authority appoints a facilitator to carry out the function as the complaint resolution function.

Article 44

The Financial Services Authority commences the facilitation process after the Consumer and The Financial Services Providers agree to be facilitated by the Financial Services Authority as written in a facilitation agreement which contains:

- a. an agreement to choose the complaint resolution facilitated by the Financial Services Authority; and
- b. a consent to obey and comply with the facilitation regulation determined by the Financial Services Authority.

Article 45

(1) The implementation of the facilitation process until the signing of the Agreement Deed is done maximum within 30 (thirty) business days from the date the Consumer and The

- Financial Services Providers sign the facilitation agreement as referred to in Article 44.
- (2) The period of the facilitation process as referred to in clause
 (1) can be extended by another 30 (thirty) business days based on the Agreement Deed of the Consumer and The Financial Services Providers.

- (1) The agreement between the Consumer and The Financial Services
 Providers resulting from the facilitation process as referred to in
 Article 45 is written in an Agreement Deed signed by the
 Consumer and The Financial Services Providers.
- (2) In the case there is not any agreement between the Consumer and The Financial Services Providers, the disagreement shall be written in minutes of the Financial Services Authority facilitation result signed by the Consumer and The Financial Services Providers.

CHAPTER IV

INTERNAL CONTROL

Article 47

- (1) The Board of Directors or management of The Financial Services Providers are responsible for the compliance of the implementation of this Regulation.
- (2) The Board of Commissioners or supervisors of The Financial Services Providers supervise the implementation of the responsibility of the Directors or management on the compliance of the implementation of this Regulation.

- (1) The Financial Services Providers shall have a supervisory system for the Board of Directors or management in the framework of Consumer protection.
- (2) The Financial Services Providers shall establish a reporting system to guarantee the optimization of the supervision of the Board of Directors or management regarding the compliance of the implementation of this Regulation.

- (1) The Financial Services Providers shall have and implement a written policy and procedure regarding Consumer protection.
- (2) The policy as referred to in paragraph (1) shall be written in the standard operating procedure which shall then be used as guidelines in all operational activities of The Financial Services Providers..
- (3) The policy and procedure as referred to in paragraph (1) shall be complied with by the management and employees of The Financial Services Providers..

Article 50

- (1) The Financial Services Providers shall have an internal control system related to Consumer protection.
- (2) The internal control system as referred to in paragraph (1) minimum covers:
 - a. compliance of The Financial Services Providers to the implementation of the Consumer protection principles; and
 - b. the reporting and monitoring system of the follow up of Consumer complaints.

CHAPTER V

CONSUMER PROTECTION SUPERVISION IN THE FINANCIAL SERVICES SECTOR

Article 51

- (1) The financial Services Authority supervises the compliance of The Financial Services Providers regarding implementation of the regulation regarding Consumer protection.
- (2) The supervision as referred to in paragraph (1) covers direct and indirect supervision.

Article 52

- (1) In the framework of supervising the compliance of The Financial Services Providers regarding the implementation Consumer protection as referred to in Article 51, the Financial Services Authority is authorized to request data and information from The Financial Services Providers in connection with the implementation of the regulation regarding Consumer protection.
- (2) The request for data and information as referred to in paragraph(1) can be done periodically or at any time if required.

CHAPTER VI

SANCTIONS

- (1) The Financial Services Providers and/or any party which violates the provision in this Financial Service Authority Regulation is subject to administrative sanction such as in the forms of:
 - a. Written warning;
 - b. Penalty i.e. the obligation to pay a certain amount of money;
 - c. Restriction of business activities;
 - d. Freezing of business activities; and e.Revocation of business permit.
 - e. Revocation of business licence.

- (2) The sanction as referred to in paragraph (1) letter b, letter c, letter d, or letter e can be subject to or without prior sanction of a written warning as referred to in paragraph (1) letter a.
- (3) The penalty as referred to in paragraph (1) letter b can be charged separately or jointly with the penalty as referred to in paragraph (1) letter c, letter d, or letter e.
- (4) The amount of the penalty as referred to in paragraph (1) letter b is determined by the Financial Service Authority based on the regulation regarding administrative sanction in the form of a penalty applicable to each financial service sector.
- (5) The Financial Services Authority can announce the administrative sanction as referred to in paragraph (1) to public.

CHAPTER VII

TRANSITIONAL PROVISIONS

Article 54

The standard agreements already issued by The Financial Services Providers before this Financial Services Authority Regulation becomes effective have to be adjusted to the provision as regulated in Article 22 at the latest at the time this Financial Services Authority Regulation becomes effective.

CHAPTER VIII CLOSING PROVISIONS

Article 55

The implementation regulations regarding Consumer protection in the financial service sector shall remain valid as long as they are not contrary to this Financial Services Authority Regulation.

Article 56

The Financial Services Providers are required to have internal completeness

to implement this Financial Services Authority Regulation maximum 1 (one) year effective from the date this Financial Services Authority Regulation is enacted.

Article 57

This Financial Services Authority Regulation becomes effective 1 (one) year after the date it is stipulated.

For public cognizance, this Regulation of The Financial Services Authority shall be announced in the State Gazette of the Republic of Indonesia.

Stipulated in Jakarta
On 26 July 2013
CHAIRMAN OF THE BOARD OF
COMMISSIONERS FINANCIAL
SERVICE AUTHORITY,

Signed by

MULIAMAN D HADAD

Enacted in Jakarta
On 6 August 2013
MINISTER OF JUSTICE AND HUMAN RIGHTS OF THE
REPUBLIC OF INDONESIA

Signed by

AMIR SYAMSUDIN

STATE GAZETTE OF THE REPUBLIC OF INDONESIA YEAR 2013 NUMBER 118

Unofficial Translation

Copied is in accordance with the original HEAD OF LEGAL ASSISTANCE DIVISION LEGAL DIRECTORATE,

Signed by

MUFLI ASMAWIDJAJA