Legal Liability of Shopee for AI Chatbot Misinformation in Consumer Protection: A Normative Juridical Analysis

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Abstract
The development of digital technology is expected to improve the quality of e-commerce services through innovations such as AI chatbots that provide fast, accurate, and responsive information. However, in practice, problems remain, particularly misinformation that may harm consumers and create uncertainty regarding legal liability. This study aims to analyze Shopee's legal responsibility for misinformation delivered by AI chatbots from the perspective of consumer protection. The research method used is library research with a qualitative approach through normative juridical analysis, employing primary sources such as the Consumer Protection Act (UUPK), the Electronic Information and Transactions Act (UU ITE), and the Government Regulation on Electronic Systems and Transactions (PP PSTE), along with secondary sources including legal books, journals, and articles. The findings show that Shopee remains legally responsible since consumers are entitled to accurate, clear, and honest

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information under the Consumer Protection Act, and electronic system providers are obliged to maintain system reliability and security under the ITE Law and PP PSTE. Thus, legal responsibility lies with the platform provider rather than the AI system itself, highlighting the need for more adaptive regulations to ensure consumer protection in the digital era.

***Keywords:** Legal Liability, AI Chatbot, Consumer Protection, E-Commerce*

Introduction

The development of digital technology has brought significant changes to social, economic, and legal interaction patterns in modern society. One of the most affected sectors is electronic commerce (e-commerce), which has become an integral part of daily consumer activities in Indonesia. E-commerce platforms such as Shopee, Tokopedia, and Lazada offer ease of access, time efficiency, and transactional flexibility for consumers. To enhance service quality, many platforms utilize artificial intelligence (AI) technology in the form of chatbots designed to respond to consumer inquiries quickly, efficiently, and in real time (Nugroho et al., 2020). While the presence of AI chatbots was initially perceived as a solution to overcome the limitations of human-based services, it has simultaneously generated new legal issues when the information provided proves to be inaccurate, misleading, or inconsistent with reality. In this context, the legal responsibility of business actors becomes a crucial issue, as it directly relates to consumer rights guaranteed under the Indonesian legal system.

As one of the largest e-commerce business actors in Southeast Asia, including Indonesia, Shopee utilizes AI chatbots to respond to consumer inquiries related to products, promotions, and service policies (Putri et al., 2023). However, empirical realities indicate that chatbots are not always capable of delivering accurate information. Errors may include misinformation regarding prices, discounts, return policies, and product safety, all of which have the potential to mislead consumers (Hutajulu, 2022). Such misinformation can result in both financial and non-financial losses for consumers, ranging from material losses due to purchasing products that do not meet expectations to immaterial losses such as diminished trust. From a legal perspective, this condition raises a fundamental question: to what extent is Shopee, as a business actor, legally responsible for misinformation provided by its chatbot, given that consumer interactions occur through an electronic system operated by AI? This issue is significant and warrants examination through a normative juridical approach by analyzing the Consumer Protection Law (UUPK), the Law on Electronic Information and Transactions (UU ITE), and other relevant regulations.

The use of AI chatbots in consumer services should ideally enhance consumer satisfaction by providing accurate, clear, and reliable information, as mandated by Article 4 letter (c) of the UUPK, which affirms consumers' right to information (Lanosta, 2021). Chatbots are also expected to function as an extension of the company in ensuring legal certainty in electronic transactions in accordance with the provisions of the UU ITE. However, in practice, numerous cases of misinformation continue to cause consumer losses, while accountability

mechanisms on the part of business actors are often unclear, delayed, or even tend to evade legal obligations. This imbalance gives rise to the central research problem, namely how Shopee's legal liability for misinformation provided by AI chatbots is viewed from the perspective of consumer protection law and electronic system regulation in Indonesia.

This study aims to analyze Shopee's legal liability for AI chatbot misinformation using a normative juridical approach. The legal analysis refers to the UUPK, the UU ITE, and other relevant regulations to clarify the legal position of consumers and the obligations of business actors in AI-based e-commerce transactions. The contribution of this research is expected to enrich academic discourse on the development of consumer protection law in the digital era, particularly concerning the use of AI in e-commerce services. Furthermore, this study is expected to provide practical recommendations for policymakers to strengthen relevant regulations and serve as a guideline for e-commerce business actors in applying the principles of prudence and legal compliance in managing AI-based chatbots.

Literature Review

Studies on the legal liability of application or platform providers for AI chatbot misinformation in the context of consumer protection are not entirely new. Several scholars have examined this issue using various methods and approaches, ranging from normative juridical analysis to empirical studies. Nevertheless, existing research generally focuses on the broader aspects of chatbot utilization, information accuracy, or platform liability in cases of fraud, thereby leaving room for more specific research addressing Shopee and the legal responsibility for misinformation generated by AI chatbots.

The work of Gio Arjuna Putra, Vicko Taniady, and I Made Halmadiningrat entitled "Legal Challenges: The Accuracy of AI Chatbot Service Information and Legal Protection for Its Users" discusses key issues related to the accuracy of information provided by AI chatbot services and its relevance to consumer protection (Putra et al., 2023). The authors employed a normative legal research method with a statutory approach, highlighting two main legal regimes, namely the Consumer Protection Law (UUPK) and the Law on Electronic Information and Transactions (UU ITE), along with their implementing regulations. Their findings emphasize that AI chatbot misinformation can cause consumer losses, and that legal remedies may be pursued through both litigation and non-litigation mechanisms. The similarity between this study and the present research lies in their shared focus on legal liability arising from inaccurate chatbot information. However, the previous study examines AI chatbots in a general Indonesian context, whereas the present research specifically analyzes the Shopee platform with an emphasis on the liability of e-commerce platforms.

Another relevant study is the work of Mohammad Haikal Rasyid, Ghina Rhoudotul Jannah, Vinka Arzetta Fiana, Najwa Latisha, Syifa Nurfajriana, and Muthia Sakti entitled "E-commerce Platform Liability for Fraud Committed by Verified Business Actors Resulting in Consumer Losses" (Rasyid et al., 2024). This study addresses the liability of e-commerce platforms in cases of fraud committed

by verified sellers, using Tokopedia as a case study. The authors adopted a normative juridical approach by examining the UUPK and the UU ITE and concluded that liability does not rest solely with sellers but also with platforms as service providers. The similarity with the present research lies in the emphasis on consumer protection in digital transactions and the position of platforms as parties bearing shared responsibility. The key difference is that the previous study focuses on fraud committed by business actors, whereas the present research concentrates on misinformation generated by AI chatbots as part of the platform's automated system.

The article by Muhammad Farhan, Lukmanul Hakim, and Yulia Hesti entitled "Legal Aspects of the Utilization of AI Chatbots in Business Support Services by PT Matahari Department Store" (Farhan et al., 2024) focuses on the legal implications of using AI chatbots in the business support services of PT Matahari Department Store. This study highlights issues related to data security, consumer privacy, compliance with Indonesian retail regulations, and the potential violation of the UUPK when chatbots provide inaccurate information. A key finding of this research is the need to strengthen internal policies on data security and legal compliance to prevent violations of consumer rights. The similarity with the present research lies in the discussion of the risks of chatbot misinformation and legal liability. However, the difference is that the previous study focuses on a physical retail company, whereas the present research specifically examines an e-commerce platform, namely Shopee, through a normative analysis of relevant laws.

Based on these three studies, it can be concluded that legal discussions on liability for AI chatbot misinformation and e-commerce platform responsibility have been widely explored, particularly in relation to information accuracy, fraud cases, and the use of chatbots in the retail sector. However, previous studies have generally addressed these issues within a broad framework and have not specifically examined the legal liability of a particular e-commerce platform for AI chatbot misinformation. Therefore, this research seeks to fill this gap by focusing on Shopee as one of the largest e-commerce platforms in Indonesia, with the aim of analyzing its legal liability for AI chatbot misinformation from a normative juridical perspective. Accordingly, this study is expected to provide a more specific and relevant academic contribution to the development of consumer protection law in the digital era.

Research Methodology

This article falls within the category of library-based research employing a qualitative approach that emphasizes normative analysis of statutory regulations, legal doctrines, and academic literature related to the legal liability of business actors in electronic transactions. The methodology applied is normative juridical analysis, which examines positive legal norms in relation to the practical implementation of e-commerce services, particularly the utilization of AI chatbots by Shopee.

The research data sources consist of primary sources in the form of relevant Indonesian statutory regulations, including Law Number 8 of 1999 on Consumer Protection (UUPK), Law Number 11 of 2008 as amended by Law Number 19 of

2016 on Electronic Information and Transactions (UU ITE), and Government Regulation Number 71 of 2019 on the Implementation of Electronic Systems and Transactions (PP PSTE). Secondary sources include books, scholarly journals, legal articles, expert opinions, and prior studies addressing consumer protection in e-commerce and the legal liability of digital platform providers. Data analysis is conducted using a descriptive-analytical method by explicating the content of applicable legal provisions and subsequently examining their relevance to the case under study. Data validation and reliability are ensured through source triangulation, namely by comparing various academic references and regulatory frameworks to obtain well-founded conclusions. The drafting system of the manuscript follows a deductive structure, adopting a general-to-specific writing pattern that begins with theoretical concepts and the framework of positive law, and culminates in an analysis of the Shopee case and the use of AI chatbots.

Basic Concepts of Legal Liability in E-Commerce Transactions

The development of digital technology has brought fundamental changes to global economic transaction patterns, including in Indonesia. The emergence of e-commerce platforms such as Shopee, Tokopedia, Lazada, and Bukalapak has transformed consumer buying and selling activities from conventional methods to fully online transactions (Barus, 2024). This transformation offers convenience, efficiency, and broader access for consumers; however, it simultaneously introduces new complexities in legal relationships between business actors and consumers. One of the most prominent issues concerns legal liability when consumers suffer losses due to misinformation, whether originating from system errors, sellers, or artificial intelligence technologies utilized by platforms. Therefore, examining the basic concepts of legal liability in e-commerce transactions is highly relevant.

The legal theory of liability constitutes the consequences borne by individuals or legal entities as a result of acts or omissions that cause harm to others. Legal liability is grounded in the principle that every action resulting in loss must give rise to responsibility for restoring the situation or providing compensation. This principle applies universally to both conventional and digital transactions. However, within the context of e-commerce, liability becomes more complex due to the involvement of multiple actors, including platform service providers, sellers, consumers, and third parties such as logistics and payment service providers. Accordingly, the discussion of liability theory serves as a fundamental basis for understanding legal relationships in online transactions.

Legal liability theory may be understood from several perspectives, including fault-based liability, strict liability, and presumed liability. Under the fault liability principle, responsibility arises only when fault or negligence can be proven. In contrast, strict liability does not require proof of fault; it is sufficient to establish that consumer loss resulted from a product or service. Presumed liability, meanwhile, places business actors in a position of being deemed liable unless proven otherwise (Windari, 2015). These three theories provide an essential framework for analyzing legal liability in e-commerce practices, which often blur the distinction between the roles of platform providers and sellers.

In the Indonesian context, the legal basis for consumer liability protection is found in Law Number 8 of 1999 on Consumer Protection (UUPK) (Widnyana et al., 2021). The UUPK affirms consumers' rights to comfort, security, and safety in consuming goods and/or services. At the same time, business actors are obligated to provide accurate, clear, and honest information regarding the products offered. This principle demonstrates that consumer law is designed to balance the unequal bargaining position between business actors and consumers. In the digital environment, this imbalance becomes even more pronounced, as consumers often occupy a weaker position vis-à-vis algorithms, platform policies, and the complexity of technologies employed by e-commerce services.

The fundamental concept of consumer law is to protect the most vulnerable party—namely, consumers—from unfair business practices. Such protection encompasses the right to accurate information, the right to choose, the right to safety, and the right to be heard (Sodikin, 2023). Conversely, business actors are burdened with obligations to act transparently, responsibly, and professionally in all interactions with consumers. Accordingly, legal liability is not limited to the obligation to compensate losses but also includes preventive responsibilities, such as providing systems that are secure, honest, and accountable. This responsibility becomes increasingly urgent when interactions between consumers and business actors are mediated by technology, including artificial intelligence–based chatbots.

E-commerce platforms occupy a unique position within consumer law as digital business actors (Wulandari & Alam, 2018). On the one hand, platforms function as intermediaries connecting sellers and buyers. On the other hand, they actively perform functions such as payment processing, promotion, logistics coordination, and after-sales services. This dual role makes it difficult to classify e-commerce platforms merely as "neutral intermediaries." In many cases, consumers perceive platforms as the primary parties responsible for losses, regardless of whether such losses are caused by sellers or by the technological systems employed. Therefore, the position of e-commerce platforms as digital business actors must be carefully analyzed within the framework of legal liability.

Furthermore, e-commerce platforms not only provide transactional spaces but also employ advanced technologies, including artificial intelligence, to serve consumers (Oktavia & Arfin, 2024). The use of AI chatbots enables consumers to receive instant responses regarding products, services, and dispute resolution. Nevertheless, AI chatbots are not free from risks, such as providing inaccurate, misleading, or incomplete information (Nurdin & Nugraha, 2025). Such errors may result in both material and immaterial losses for consumers. Consequently, a critical legal question arises: to what extent can e-commerce platforms be held liable for misinformation originating from AI systems that they develop or deploy?

In addressing this issue, liability theories again serve as an analytical foundation. Under a strict liability approach, platforms may be held directly responsible without requiring proof of fault, as consumer losses arise from the use of technology that constitutes an integral part of the service. Conversely, under a fault liability approach, consumers must demonstrate that their losses resulted from the platform's negligence in supervising or designing its AI systems. Meanwhile, the presumed liability approach shifts the burden of proof to business actors to demonstrate the absence of fault. The selection of these liability theories

significantly influences the direction of consumer protection policies in the digital era.

In Indonesia, the strict liability approach is more consistent with the characteristics of consumer protection law. This is based on the principle that consumers are in a weak position when required to prove technical faults, particularly when confronting complex technologies such as AI. The UUPK itself reflects a strong commitment to maximum consumer protection, as evidenced by provisions imposing liability on business actors for goods and/or services that cause consumer losses. Therefore, within the context of e-commerce, digital platforms should not merely function as facilitators but should also bear full responsibility when the services they provide, including AI chatbots, cause harm to consumers.

In addition to the UUPK, another relevant legal framework is Law Number 11 of 2008 on Electronic Information and Transactions (UU ITE), as amended. The UU ITE regulates the validity of electronic transactions, the obligations of electronic system providers, and their liability for user losses. Article 15 of the UU ITE stipulates that electronic system providers must operate their systems reliably and are responsible for ensuring proper system functionality (Government of Indonesia, 2008). This provision further reinforces the position that e-commerce platforms cannot evade legal responsibility when the systems they manage, including AI chatbots, fail to provide accurate information to consumers.

From a practical perspective, the concept of legal liability in e-commerce transactions must evolve in line with technological advancements. Law must not lag behind digital developments; otherwise, consumers will remain disadvantaged without effective protection mechanisms. Therefore, it is essential to develop more specific regulations concerning the legal liability of digital business actors, including minimum technological security standards, AI oversight mechanisms, and consumer complaint and compensation systems. Such measures will contribute to creating a more equitable, secure, and sustainable e-commerce ecosystem.

AI Chatbots in E-Commerce Services and the Potential for Misinformation
The development of artificial intelligence (AI) technology has brought significant changes to the business landscape, including the e-commerce sector (Nur et al., 2024). One widely adopted innovation is the AI chatbot, an automated conversational system designed to interact with consumers in real time. The presence of chatbots on e-commerce platforms not only enhances service efficiency but also offers a more personalized and responsive shopping experience. Consumers can easily inquire about product availability, payment methods, and delivery estimates without waiting for direct interaction with human staff. However, behind these advantages lies a potential problem, particularly when chatbots provide inaccurate or misleading information. This raises fundamental questions regarding legal responsibility in consumer protection in the digital era.

In principle, AI chatbots are designed to replace many customer service functions previously performed by human operators. Chatbots are capable of instantly answering basic inquiries, providing product recommendations based on consumer preferences, and assisting with transaction processes from initiation to

completion. Their speed, 24-hour availability, and capacity to handle thousands of interactions simultaneously make AI chatbots an effective solution for overcoming human resource limitations. Nevertheless, these capabilities depend heavily on algorithms, databases, and machine-learning processes embedded within the system. When the information programmed into or learned by chatbots is inaccurate, the risk of erroneous responses becomes substantial. This represents a critical vulnerability that is often overlooked by e-commerce platforms.

Within e-commerce transactions, chatbots serve a strategic function as a communication bridge between consumers and the platform system or sellers (Fatihah & Saidah, 2021). Chatbots do not merely provide passive information but also proactively offer products, promote discounts, and suggest alternative purchasing options. Such interactions shape consumers' perceptions of a platform's reliability. Consequently, the quality of information delivered by chatbots significantly influences consumer trust. When chatbots provide accurate responses, consumers feel satisfied and secure. Conversely, when information is incorrect or misleading, consumer trust may erode and result in tangible losses.

The potential for misinformation arising from AI chatbots may include inaccuracies regarding product prices, availability, delivery timelines, and service terms and conditions (Putra et al., 2023). For instance, a chatbot may indicate that a product is available when it is out of stock, or promise a discount that does not actually apply. Although such errors may appear trivial to some parties, for consumers, misinformation can result in financial losses and wasted time. Moreover, systematic misinformation may constitute a violation of consumer rights, as it fails to meet the legal requirement to provide accurate, clear, and honest information under consumer protection law.

Beyond technical errors, chatbots may also generate misleading information due to imperfect algorithms or biases in the data used for machine learning (Oktaviani et al., 2024). When responding to inquiries regarding product safety, chatbots may oversimplify risks, leading consumers to believe that a product is safe when, in reality, it poses potential hazards. This condition raises serious legal concerns, as consumers are entitled to complete and accurate information before making purchasing decisions. Inaccuracies originating from AI systems must still be regarded as the responsibility of business actors, rather than being dismissed as mere technological errors.

From a business perspective, the use of AI chatbots is often viewed as a cost-efficiency strategy (Nugraha et al., 2022). By replacing human customer service functions, companies can reduce operational expenses while expanding service coverage. However, such efficiency carries legal risks that cannot be ignored. When chatbots fail to provide accurate information, consumers often lack immediate access to human clarification. This exacerbates potential consumer losses, as misinformation cannot be promptly corrected. In other words, the efficiency pursued by digital platforms may become counterproductive if not accompanied by adequate control mechanisms.

Legally, the position of chatbots in e-commerce services cannot be separated from the responsibility of electronic system providers, namely the e-commerce platforms themselves (Putra et al., 2023). Chatbots are merely tools created, deployed, and controlled by platform providers. Accordingly, any

misinformation arising from chatbots fundamentally constitutes the full responsibility of business actors. This aligns with the principle of strict liability in consumer law, whereby business actors remain liable even when errors arise from technological factors. Under this principle, consumers are not required to prove human fault but need only demonstrate that losses occurred as a result of incorrect information.

In practice, the risk of chatbot misinformation is often addressed through standard clauses or disclaimers stating that chatbot information may not always be accurate and that consumers are encouraged to conduct further verification (Taibu, 2020). However, such clauses contradict the spirit of consumer protection, as they shift the burden of responsibility onto consumers. Indonesian consumer protection law, particularly the UUPK, explicitly prohibits clauses that reduce or eliminate the liability of business actors. Therefore, the existence of disclaimers cannot serve as a legal basis for platforms to evade responsibility for chatbot misinformation.

The potential impact of chatbot misinformation extends beyond individual consumers and affects the reputation and public trust of e-commerce platforms. In the digital era, trust constitutes a primary asset in retaining consumers. A single case of misinformation that goes viral on social media can cause reputational damage far exceeding material compensation costs. Consequently, platform providers must recognize that controlling chatbot systems is not merely a matter of legal compliance but also a long-term business strategy to maintain consumer loyalty.

From an international legal perspective, the issue of chatbot liability has begun to receive increasing attention. The European Union, through the proposed AI Act, is developing regulations concerning safety and transparency standards for AI usage, including chatbots (Wicaksono, 2020). Such regulations aim to ensure that consumers receive maximum protection when interacting with automated systems. Indonesia, in turn, can draw lessons from global practices to anticipate the growing use of AI in e-commerce. The absence of clear regulations may leave consumers vulnerable to losses without effective legal remedies.

The role of AI chatbots in e-commerce cannot be underestimated. They are not merely communication tools but also legal instruments with significant implications for consumer protection. Well-designed chatbots can enhance efficiency and convenience, while poorly controlled systems may become sources of consumer harm. Therefore, a balance must be struck between technological utilization and consumer protection through firm legal regulation, robust internal oversight mechanisms, and consumer education regarding the limitations of chatbot systems.

Normative Juridical Analysis of Shopee's Legal Liability

The development of information technology has brought fundamental changes to modern trading systems, particularly through the emergence of e-commerce platforms such as Shopee. As one of the largest platforms in Indonesia, Shopee facilitates millions of transactions between consumers and sellers on a daily basis by utilizing electronic systems and artificial intelligence–based

technologies (Izzudin et al., 2025). However, these technological advancements are not without legal challenges, especially when consumer losses arise from misinformation provided by automated service systems such as chatbots. This situation raises questions regarding the extent to which Shopee may be held legally liable within the framework of prevailing Indonesian laws, particularly the Consumer Protection Law (UUPK), the Law on Electronic Information and Transactions (UU ITE), and their implementing regulations.

Normative juridical analysis is a legal approach that focuses on examining applicable statutory regulations in order to assess a legal event. Through this approach, Shopee's liability for misinformation can be evaluated based on positive law rather than solely on business practices. This approach is essential because digital transactions often create complexity in determining the legally responsible subject, particularly within the triangular relationship among platforms, sellers, and consumers. Therefore, a normative assessment of existing regulations is a crucial step in understanding Shopee's legal position in relation to liability.

Law Number 8 of 1999 on Consumer Protection (UUPK) provides the primary legal basis for safeguarding consumer rights. Article 4 of the UUPK stipulates that consumers are entitled to comfort, security, and safety in consuming goods and/or services, as well as the right to obtain accurate, clear, and honest information (Government of Indonesia, 1999). When Shopee, through its AI chatbot, provides incorrect information, such conduct directly violates consumer rights. Article 7 of the UUPK further affirms the obligation of business actors to provide accurate, clear, and honest information regarding the condition and guarantees of goods and/or services. Accordingly, within the framework of the UUPK, Shopee may be held liable when misinformation generated by its system causes consumer losses.

Furthermore, Article 19 of the UUPK explicitly states that business actors are obligated to provide compensation for losses incurred as a result of the consumption of goods and/or services produced or traded (Government of Indonesia, 1999). This liability is direct in nature, even when losses arise from negligence or misinformation. As a platform provider operating electronic systems, including chatbots, Shopee cannot argue that such errors occur solely due to technological factors. The UUPK places consumers in a position of maximum protection; therefore, any losses resulting from inaccurate information remain the responsibility of business actors, including Shopee.

In addition to the UUPK, Law Number 11 of 2008 on Electronic Information and Transactions (UU ITE), as amended by Law Number 19 of 2016, also establishes a legal framework governing the responsibilities of electronic system providers. Article 15 of the UU ITE stipulates that electronic system providers are required to operate systems in a reliable and secure manner and are responsible for ensuring proper system functionality (Government of Indonesia, 2008). Under this provision, Shopee is not only required to provide a transactional platform but must also ensure that AI-based services, such as chatbots, deliver accurate and reliable information. Failure to meet these standards may constitute a violation of the UU ITE.

The UU ITE further emphasizes that electronic system providers are obligated to maintain the confidentiality, integrity, and availability of the electronic

information they manage. In practice, chatbots that disseminate inaccurate information may be considered a breach of the obligation to maintain system reliability. This aligns with the accountability principle embedded in the UU ITE, which underscores the responsibility of electronic system providers. Consequently, Shopee cannot shift liability for misinformation to third parties, such as sellers or technology developers, because its role as the platform controller positions it as the primary legal subject responsible for system performance.

In addition to the UUPK and the UU ITE, subordinate regulations such as Government Regulation Number 71 of 2019 on the Implementation of Electronic Systems and Transactions (PP PSTE) are also relevant to this analysis. This regulation reinforces the obligation of electronic system providers to ensure system reliability in electronic transactions. Article 3 of the PP PSTE states that electronic systems must be operated in a reliable, secure, and accountable manner (Government of Indonesia, 2019). If Shopee's chatbot fails to meet these standards, the platform may be deemed to have violated regulatory provisions and may be subject to administrative sanctions or legal claims.

Another relevant regulatory instrument is the regulation issued by the Ministry of Trade concerning consumer protection and electronic-based commerce. This regulation sets out technical requirements regarding the responsibilities of business actors in online transactions, including the obligation to provide clear, accurate, and non-misleading information. As a marketplace provider, Shopee must comply with these provisions to ensure that its business practices do not harm consumers. Failure to comply may constitute an administrative violation that could result in sanctions or the revocation of business licenses.

A deeper analysis of the UUPK, the UU ITE, and the PP PSTE reveals a common thread: the affirmation of the accountability principle for digital business actors. This principle asserts that legal liability cannot be avoided on the grounds of technological complexity. As a major business entity, Shopee possesses the resources to control, supervise, and improve the chatbot systems it deploys. Therefore, from a normative perspective, there is no legal justification for Shopee to evade liability for consumer losses arising from misinformation generated by systems under its control.

In practice, arguments often arise asserting that Shopee merely acts as an intermediary between sellers and buyers. Such arguments attempt to limit Shopee's liability to the provision of a transactional platform rather than responsibility for informational content. However, a normative approach demonstrates that Shopee's role extends beyond that of a neutral intermediary. Through its active involvement in promotion, payment services, and the use of chatbots to disseminate information, Shopee effectively assumes the legal position of a business actor.

Moreover, Indonesian law prohibits the inclusion of standard clauses that exempt business actors from liability, as stipulated in Article 18 of the UUPK. Accordingly, Shopee cannot incorporate terms and conditions that absolve it of responsibility for chatbot errors. Such clauses are deemed null and void as they contravene consumer protection principles. Therefore, Shopee's liability for chatbot misinformation is imperative in nature and cannot be waived through

unilateral contractual provisions.

Based on the foregoing analysis, the normative juridical approach demonstrates that Shopee, as an e-commerce platform provider, bears clear legal liability for any misinformation generated by its AI chatbot. The UUPK emphasizes the obligation of business actors to provide accurate and honest information; the UU ITE mandates electronic system providers to maintain system reliability; and the PP PSTE reinforces the principle of accountability in digital services. Consequently, Shopee's legal liability is unavoidable. Normatively, Indonesian law prioritizes consumer protection, thereby requiring e-commerce platforms to bear responsibility for consumer losses arising from misinformation disseminated by chatbot systems as part of their legal obligations.

Legal Implications and Consumer Protection Efforts against AI Chatbot Information Errors

The digital era has significantly transformed global economic transactions, including in Indonesia, through the emergence of e-commerce platforms that utilize artificial intelligence (AI) to enhance service quality. One of the most prominent innovations is the use of AI-based chatbots, which enable consumers to obtain product information, promotional details, and customer support instantly. However, the application of this technology does not always operate flawlessly. Chatbots may provide incorrect, misleading, or incomplete information, thereby causing losses to consumers. This situation gives rise to complex legal implications, particularly concerning the liability of e-commerce platforms such as Shopee. Therefore, an examination of the legal consequences and consumer protection efforts becomes highly relevant.

The first legal implication concerns the obligation of Shopee, as an electronic system operator, to be responsible for information errors generated by its chatbot. Under the Consumer Protection Law (Undang-Undang Perlindungan Konsumen/UUPK), business actors are required to provide accurate, clear, and honest information (Government of Indonesia, 1999). When this obligation is violated, Shopee may be held legally liable, including for material and immaterial compensation. Such liability is not limited to civil claims brought by consumers but may also extend to administrative sanctions imposed by the government and, in certain circumstances, criminal liability if there is evidence of intentional misleading conduct.

In addition to the UUPK, legal implications may also be examined under the Law on Information and Electronic Transactions (Undang-Undang Informasi dan Transaksi Elektronik/UU ITE). Article 15 of the UU ITE obliges electronic system operators to ensure that their systems are reliable, secure, and accountable for their proper functioning (Government of Indonesia, 2008). If a chatbot fails to meet these requirements, Shopee as the system operator may be deemed negligent in maintaining system reliability. Negligence in this context does not merely refer to technical malfunctions but also includes the system's inability to deliver accurate information to consumers. Accordingly, the UU ITE provides a strong legal basis for holding Shopee accountable for chatbot-related information errors.

From the consumer's perspective, misinformation provided by chatbots can

result in various forms of loss. For instance, consumers may purchase products based on the assumption of discounted prices that do not actually apply, or rely on inaccurate product safety information. These losses are not only financial in nature but may also include immaterial damages such as disappointment, loss of trust, and even potential health and safety risks when certain products are involved. In such cases, consumers have the right to seek compensation through available legal mechanisms, including filing claims with the Consumer Dispute Resolution Agency (Badan Penyelesaian Sengketa Konsumen/BPSK) or pursuing litigation before the courts.

The legal implications for Shopee extend beyond compensation obligations and also affect its reputation and business sustainability. In the e-commerce sector, consumer trust constitutes a fundamental asset. Cases of misinformation that become viral on social media can significantly damage a platform's public image and undermine consumer confidence (Fitriani et al., 2024). Consequently, legal responsibility should not be viewed merely as compliance with normative obligations but as an integral component of long-term business strategy. Shopee must recognize that legal compliance positively contributes to consumer loyalty and business continuity.

Although the UUPK and UU ITE provide an adequate legal foundation for consumer protection, consumers often encounter difficulties in asserting their rights in practice. These obstacles include limited consumer awareness of complaint mechanisms, procedural complexity, and the dominant bargaining position of e-commerce platforms. Therefore, consumer protection efforts should not rely solely on existing legal instruments but must be reinforced by practical and accessible mechanisms. For example, platforms should establish dedicated complaint centers that are transparent, efficient, and responsive to consumer grievances related to chatbot errors.

Furthermore, the government, through the Ministry of Trade and the Ministry of Communication and Informatics, plays a crucial role in strengthening digital consumer protection. Supervision of e-commerce practices must be intensified, including conducting audits of AI chatbot systems to ensure their reliability and information accuracy. Administrative sanctions such as warnings, fines, and license revocation may be imposed to create a deterrent effect for negligent platforms. With strict oversight, business actors will be more inclined to prioritize consumer interests rather than focusing solely on business efficiency.

In addition to supervision, consumer education constitutes an essential component of legal protection (Aulia & Fatmawati, 2023). Consumers must be informed that chatbot-generated information is not always definitive and may contain errors. Such education can be implemented through digital literacy campaigns involving the government, academics, and civil society organizations. With higher levels of awareness, consumers are more likely to exercise caution in accepting chatbot information and to actively verify its accuracy before making transactional decisions.

On the other hand, Shopee as a business actor must also adopt preventive measures to reduce the risk of misinformation. These measures include regularly updating chatbot algorithms, ensuring accurate data integration, and providing alternative channels for consumers to obtain clarification directly from human

customer service representatives. By combining automated services with human intervention, the likelihood of information errors can be minimized. Additionally, Shopee should establish strict internal standards to test chatbot reliability prior to public deployment.

In the long term, future regulatory recommendations should focus on more specific governance of AI usage in consumer services. Such regulations may include minimum accuracy standards for chatbots, transparency obligations, and third-party audit mechanisms to ensure platform accountability. These regulations should also mandate business actors to provide automatic compensation mechanisms for consumers harmed by chatbot misinformation. Clear regulatory frameworks will strengthen legal protection in the relationship between consumers and digital business actors.

Indonesia may also draw lessons from international legal developments, such as the European Union's AI Act, which establishes specific regulatory standards for artificial intelligence technologies. Such regulations address AI risk classification, levels of potential harm, and transparency obligations for system operators. By adopting similar principles, Indonesia can formulate policies that are more responsive to technological advancement. This approach would position Indonesia not merely as a passive technology user but as a proactive state in providing legal protection for consumers in the digital era.

The legal implications of AI chatbot misinformation for Shopee are evident: platforms are obliged to bear responsibility for consumer losses under the UUPK and UU ITE. However, consumer protection cannot rely solely on legal norms; it also requires effective supervision, education, and responsive regulatory innovation. Consumer protection efforts must be comprehensive, involving the government, business actors, and civil society. In the future, more specific regulations governing AI use in consumer services are essential to ensure that misinformation is no longer a threat but can be systematically anticipated. Through such measures, the e-commerce ecosystem can develop in a fair, secure, and sustainable manner.

Conclusion

Based on the normative juridical analysis, it can be concluded that Shopee, as an e-commerce platform provider, bears legal responsibility for misinformation delivered by its AI chatbot to consumers. This conclusion is grounded in the principles of consumer protection as regulated under the Consumer Protection Law (UUPK), which affirms consumers' rights to accurate, clear, and honest information, as well as the obligation of business actors to be accountable for any losses incurred. Furthermore, the Law on Information and Electronic Transactions (UU ITE) and the Regulation on Electronic Systems and Transactions (PP PSTE) emphasize the obligation of electronic system operators to ensure reliable and secure systems. Consequently, Shopee cannot be justified in disclaiming liability through limitation clauses. Therefore, misinformation generated by an AI chatbot constitutes a form of negligence that gives rise to legal liability for Shopee as both an electronic system operator and a business actor.

The implications of this study indicate that although AI chatbots function merely as technological instruments, legal responsibility remains attached to the platform provider as the party benefiting from their use. Accordingly, stronger consumer protection mechanisms are required, including operational standards for the use of AI chatbots that prioritize information accuracy, transparency, and accessible consumer complaint mechanisms. In addition, regulatory updates are necessary to anticipate developments in digital technology and to ensure legal certainty for consumers. Through these measures, the e-commerce ecosystem can operate in a more equitable and secure manner, in line with the objectives of consumer protection in Indonesia.

References

Aulia, H., & Fatmawati, M. (2023). Media edukasi dan literasi konsumen dalam aplikasi Shopee: Studi literatur dalam budaya berbelanja. *Patria Education Journal*, *3*(3).

Barus, D. H. N. (2024). Popularity of Big Five *E-commerce* in Indonesia. *International Journal of Advances in Engineering and Management*, *6*(2).

Farhan, M., Hakim, L., & Hesti, Y. (2024). Aspek Hukum Pemanfaatan Chatbot AI Dalam Layanan Dukungan Bisnis oleh PT. Matahari Department Store. *Jurnal Multidisiplin Indonesia*, *3*(1).

Fatihah, D. C., & Saidah, I. (2021). Model promosi marketplace berbasis Artificial Intelligence (AI) di Indonesia. *Jurnal Ilmiah Manajemen Bisnis Dan Inovasi Universitas Sam Ratulangi*, *8*(3).

Fitriani, R., Febiantina, E. A., Amanta, J., & Mawaddah, T. B. (2024). Kajian Hukum Terhadap Konsumen yang Dirugikan Dalam Transaksi Jual Beli di Platform Shopee. *Jurnal Karimah Tauhid*, *3*(11).

Hutajulu, A. (2022). *Tanggung jawab penyelenggara sistem elektronik terhadap kosmetik palsu*. Skripsi Sarjana, Universitas Pembangunan Nasional Veteran Jakarta.

Izzudin, A., S, C. Y. Y., Ramadhini, A. C., & Aulia, V. R. (2025). Pengaruh Penggunaan Teknologi Chatbot dalam Meningkatkan Layanan Pelanggan pada Platform E-Commerce: Studi Kasus pada Shopee Indonesia. *Jurnal Multidisiplin Saintek*, *8*(7).

Lanosta, E. (2021). Perlindungan Konsumen Atas Informasi yang Benar Terhadap Promosi Produk dalam Transaksi Perdagangan Elektronik Menurut Undang–Undang Nomor 8 Tahun 1999 Tentang Perlindungan Konsumen. *Jurnal Hukum Adigama*, *4*(1).

Nugraha, Y., Masnita, Y., & Kurniawati, K. (2022). Peran Responsiveness Chatbot Artificial Intelligence Dalam Membentuk Customer Satisfaction. *Jurnal Manajemen Dan Bisnis Sriwijaya*, *20*(3).

Nugroho, A., Adi, D. P., & Gumelar, A. B. (2020). Chatbot Untuk Customer Service Berbasis Teks dan Suara pada Sistem Manajemen Pemesanan (OMS) Menggunakan Platform Android. *Jurnal Repositor*, *2*(6).

Nur, A., Wijanarko, D., Solahuddin, A. D., Wibowo, H. A., & Maulana, H. H. (2024). Analisis Penerapan Teknologi Kecerdasan Buatan (AI) dalam Industri *E-commerce* di Indonesia. *Jurnal Sains Dan Teknologi*, *4*(11).

Nurdin, S. W., & Nugraha, I. F. (2025). Ancaman Deepfake dan Disinformasi Berbasis AI: Implikasi Terhadap Keamanan Siber dan Stabilitas Nasional Indonesia. *Journal Of International Multidisciplinary Research*, *4*(1).

Oktavia, T., & Arfin, C. W. (2024). Revolutionizing *E-commerce* with AI Chatbots: Enhancing Customer Satisfaction and Purchase Decisions in Online Marketplace. *Journal of Theoretical and Applied Information Technology*, *102*(19).

Oktaviani, D., A., F. T., Ayuni, M., Sembiring, T., Lie, W., & Yeo, E. (2024). Analisis Dampak Kecerdasan Buatan dalam Peningkatan Efisiensi Pemasaran Digital di Industri *E-commerce* Indonesia. *Jurnal Manajemen Dan Bisnis Ekonomi*, *2*(4).

Pemerintah Indonesia. (1999). *Undang-Undang Nomor 8 Tahun 1999 tentang Perlindungan Konsumen*. Lembaran Negara Republik Indonesia.

Pemerintah Indonesia. (2008). *Undang-Undang Nomor 11 Tahun 2008 tentang Informasi dan Transaksi Elektronik*. Lembaran Negara Republik Indonesia.

Pemerintah Indonesia. (2019). *Peraturan Pemerintah Nomor 71 Tahun 2019*. Lembaran Negara Republik Indonesia.

Putra, G. A., Taniady, V., & Halmadiningrat, I. M. (2023). Tantangan Hukum: Keakuratan Informasi Layanan AI Chatbot dan Pelindungan Hukum terhadap Penggunanya. *Jurnal Media Pembinaan Hukum Nasional*, *12*(2).

Putri, L. A., Wardani, A. P., Firdausiyah, W., Anggraeni, D., & Nurhayati, C. (2023). Efektivitas chatbot sebagai media komunikasi e-bisnis produk skincare dengan sistem CRM pada marketplace Shopee. *Jurnal Ilmu Manajemen Dan Akutansi*, *11*(2).

Rasyid, M. H., Jannah, G. R., Fiana, V. A., Latisha, N., Nurfajriana, S., & Sakti, M. (2024). Pertanggungjawaban Platform *E-commerce* Terhadap Penipuan Oleh Pelaku Usaha Terverifikasi Yang Mengakibatkan Kerugian Konsumen. *Jurnal Media Hukum Indonesia*, *2*(2).

Sodikin, S. (2023). Konsep Perbuatan Melawan Hukum Dengan Model Pertanggungjawaban Mutlak (Strict Liability) Dalam Penyelesaian Sengketa Konsumen. *Jurnal Spektrum Hukum*, *20*(2).

Taibu, R. (2020). Pencantuman Disclaimer dalam Transaksi *E-commerce* Ditinjau dari Undang-Undang Nomor 8 Tahun 1999 Tentang Perlindungan Konsumen. *Jurnal Akademia*, *17*(1).

Wicaksono, M. R. (2020). *Tantangan dan Prospek Pembaruan Hukum dalam Kasus Penggunaan Artificial Intelligence pada Praktik Diskriminasi Harga di Indonesia (Studi Komparatif Sistem Hukum Indonesia dan Uni Eropa)*. Skripsi Sarjana, Universitas Gadjah Mada.

Widnyana, P. R. W., Agung, A. A. I., & Astiti, N. G. K. S. (2021). Tinjauan Yuridis Pertanggungjawaban Mutlak (Strick Liability) dalam Hukum Perlindungan Konsumen. *Jurnal Konstruksi Hukum*, *2*(2).

Windari, R. A. (2015). Pertanggungjawaban Mutlak (Strict Liability) dalam Hukum Perlindungan Konsumen. *Jurnal Komunikasi Hukum*, *1*(1).

Wulandari, B. T., & Alam, P. P. (2018). Tinjauan Yuridis Pertanggungjawaban Pelaku Usaha dalam Transaksi Jual Beli Melalui Marketplace. *Jurnal Paradigma Hukum Pembangunan*, *3*(1).