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*Original Article*

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# Electronic Storage Of Notary Protocols Based On A Cloud Computing System In The Cyber Notary Concept

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**Abstract**
The manual storage of notary protocols poses various risks such as damage due to unforeseen events, degradation from chemical influences, destruction by rodents or insects, dispersal, loss, and physical harm. It is crucial for notaries to embrace modern technology for storing notary protocols electronically, particularly through the use of Cloud Computing Systems. According to Article 1 number 13 of the Notary Act, notary protocols are considered state archives that notaries are responsible for preserving in compliance with relevant legal regulations. Therefore, the management of notary protocols should adhere to the Archives Law and Government Regulation Number 28 of 2012. The Notary Protocol, considered a dynamic archive of vital importance, should have the capability to be transformed into electronic documents. As stated in Article 48 and Article 49 paragraph (1) of Government Regulation Number 28 of 2012, the transfer of dynamic archive media is permissible, and such transfer can take any form in line with technological advancements and information regulations. The adoption of a Cloud Computing System for the electronic storage of Notary Protocols reflects the progress in technology and information. The concept of Idea cyber notary involves using technological advancements to enable notaries to perform their notarial responsibilities. Notaries, acting as data controllers and processors for their clients' personal data, have the responsibility to gather, store, and handle such information. In legal terms, notaries can be held accountable for mishandling personal data.

**Keywords:** cloud computing system; cyber notary; notary protocol

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## Introduction

In practice, notary services in Indonesia are still conventional, which means that activities between notaries and appraisers are still carried out face-to-face. In the current Industrial Revolution 4.0 Era. This can also be applied in legal life in the form of information technology-based notary services or known as Cyber Notary. (Makarim, 2020) The idea of Cyber Notary has a concept, namely by utilizing advances in information technology for notaries to carry out their notary duties, including digitizing documents, signing authentic deeds electronically, utilizing teleconferencing in the implementation of the company's General Meeting of Shareholders.

In Law of the Republic of Indonesia Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning the Notary Position, Cyber Notary has been regulated in the Explanation of Article 15 paragraph (3) which states that the enactment of Cyber Notary is only in the authority to certify transaction activities between the Notary and the Witness, but this has not been implemented in the authority of the notary as a whole such as the making of deeds. This is the point of concern that Cyber Notary in Indonesia has not been fully involved in legal life, especially notary services, because there is no clear regulation regulating Cyber Notary as a whole.

A notary is a public official or a person authorized by law to make an authentic deed (Ramadan et

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al., 2022; Tobing, 1980). Laws and regulations related to the duties and authorities of a Notary are regulated in Law of the Republic of Indonesia Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning the Position of Notary which requires the making of authentic deeds to create legal protection and certainty (SINAGA, 2015). In carrying out the duties of their positions (Hoiriyah, 2023), one of the obligations of a notary in the field of administration is to store and maintain all documents including a collection of deeds and various other documents commonly known as notary protocols (Ramadan et al., 2022).

Article 1 number 13 of Law of the Republic of Indonesia Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning Notary Positions defines that the Notary Protocol is a collection of documents that are state archives that must be kept and maintained by Notaries (Kurniawan et al., 2020; Saputra, 2023). In the Explanation of Article 62 of Law of the Republic of Indonesia Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning Notary Positions, it is stated that the Notary Protocol consists of: (Yuniati et al., 2023)

Minuta Deed;

Deed register book or repertrium;

A book of deeds under the hand whose signature is made before a Notary or a deed under the registered hand;

A book of names of the person or clapper;

Protest list book;

Wills book; and

Other list books that must be kept by the Notary based on the provisions of laws and regulations.

The rules for notary protocols in Article 63 paragraph (5) of Law of the Republic of Indonesia Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning Notary Positions regarding the submission of notary protocols to replacement notaries whose submission time is 25 years or more to the Regional Supervisory Council cannot be applied because the Regional Supervisory Council is unable to keep many notary protocols that are more than 25 years old in the office of the Regional Supervisory Council. This causes the notary protocol to remain stored at the notary office concerned (Edfiene Pungus & Gunardi, 2023; Ngadino, 2021).

The Notary Protocol is a state archive that must be kept and maintained as well as possible by a notary. In the storage of notary protocols(Isna Vonna et al., 2021), a careful process is required, so that the notary protocol is not scattered, lost or damaged (Riza Kuswanto & Purwadi, 2017; Rizkiana & Ratna, 2022).

The substitute notary is also obliged to keep the protocol inherited to him by the deceased notary. It can be imagined how much space is needed to store the notary protocol, as well as the risk of fire, rat bites or other insects, and flood disasters. Therefore, to anticipate the impact of the storage and maintenance process that is constrained on the place and maintenance costs, the solution for the storage of the notary protocol is through the application of information technology or electronically (Rositawati et al., 2017).

Such is the importance of the position of authentic deeds made by notaries, so that the storage of deed minuta as part of the notary protocol is also important (Wulandari & Bawono, 2022). However, Law of the Republic of Indonesia Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning Notary Positions has not regulated the development of electronic-based notary protocol storage. The provisions of Article 16 paragraph (1) letter b and its explanation only stipulate the obligation of a notary in carrying out his position, namely making a deed in the form of a deed and storing it as part of the notary protocol in its original form to maintain the authenticity of a deed so that if there is a forgery or misuse of grosse, the copy, or quotation can be immediately known easily by matching it with the original (Setiawan & Octarina, 2022).

Problems regarding the storage of Notary Protocol and other Notary documents can be simplified by storing deeds electronically, which is a form of implementation of Cyber Notary. The use of computer devices for Notaries is not a strange thing anymore because currently Notaries make deeds, store records and data necessary to support the efficiency of Notary performance to provide services to the community. The Notary Protocol is also part of the State Archives so that its storage should refer to the provisions of Law of the Republic of Indonesia Number 43 of 2009 concerning Archives and is supported by the National Archives Institute (National Archives of the Republic of Indonesia/ANRI) as the organizer of the National Archives, especially in terms of fostering archives and storing archives electronically (Dramela et al., 2019). Based on the provisions of Article 68 of Law of the Republic of Indonesia Number 43 of 2009 concerning Archives, it has been possible to create archives in various forms and/or transfer media including electronic media and/or other media so that based on this the storage of archives electronically can be carried out.

The many activities that must be carried out by Notaries in carrying out their duties in carrying out public services, document storage and Notary administrative reporting archives, make Notaries have to take advantage of current technological advances related to the storage system related to the implementation of Cyber Notary (Lingga et al., 2021). This aims to make it easier for Notaries to carry out the practice of their positions by including all the administration of deeds or other documents into one unit into the form of an application, as well as for reminders of deadlines for unfinished work and supervision of work in the Notary office. One of the electronic systems that can help Notaries is the Cloud Computing System-based electronics. Cloud Computing means storing and accessing data and programs over the internet from different locations or using computers from our computer's hard drive. The main requirement in the concept of Cloud Computing is the presence of the internet to access data (Lavinda, 2020).

Based on the description above that has been described, the formulation of the problem in this study is: How is the application of electronic notary protocol storage based on a cloud computing system (Cloud Computing System) in the concept of Cyber Notary? and What is the responsibility of notaries for the personal data of their service users who use the electronic storage of notary protocols? In line with the formulation of the problem that has been presented above, this study aims to: analyze the application of electronic notary protocol storage based on a cloud computing system (Cloud Computing System) in the concept of Cyber Notary and examine the responsibility of notaries for the personal data of their service users who use electronic notary protocol storage.

## Method

The nature of this research is descriptive analysis that uses normative legal research and the approaches used, namely the Legislative Approach (Statue Approach) and the Conceptual Approach (Conceptual Approach). This approach is used to understand the concepts of electronic storage of notary protocols in the concept of Cyber Notary. The data collection method is carried out by library research From this research, secondary data will be obtained with legal materials including primary legal materials, secondary legal materials, and tertiary legal materials. The data presentation technique, namely narrative or text presentation, is the presentation of research data in the form of sentences. The presentation of data in the form of narrative or text is a general description of the conclusion about the observation results of secondary data. After all the data is collected and processed systematically, then a qualitative analysis is held (Utama, 2022; UTAMA & WIRYANI, 2023).

## Discussion

### Application of Electronic Notary Protocol Storage Based on Cloud Computing System in the Concept of Cyber Notary

The enactment of Law of the Republic of Indonesia Number 8 of 1997 concerning Company Documents, became the starting point for the transfer of data in the form of letters or writings on paper (based paper) into electronic media (Rahadian, 2022; Rositawati et al., 2017; Waskito et al., 2021). As stated in the consideration of the formation of this law, in the section considering in letter f that technological advances have made it possible for records and documents made on paper to be transferred into

electronic media. Based on the consideration of letter e of Law of the Republic of Indonesia Number 8 of 1997 concerning Company Documents, media transfer is an option so that a company in storing documents does not cause economic and administrative burdens (Syuaib et al., 2021).

Regulation of notary protocols is currently an urgent need, considering that these protocols are state archives that until now are still controlled by notaries. It can be imagined how much space is needed to store the notary protocol, as well as the risk in the event of a fire, being bitten by rats or other insects, and floods and other natural disasters. Therefore, to anticipate the impact of the storage and maintenance process that is constrained on the place and cost of maintenance. The notary protocol media diversion is considered to be a solution to this condition. However, to be able to carry out the media diversion, several related regulations are still needed that specialize in the procedures for media diversion, the storage of media transfer documents to legal guarantees for electronic documents resulting from the notary protocol media transfer process.

The regulation regarding the notary protocol contained in Law of the Republic of Indonesia Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning the Notary Position is only limited to the creation, storage and submission of notary protocols (Agra et al., 2022), as contained in Articles 58 to 65 of Law of the Republic of Indonesia Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning Notary Positions. Although Law of the Republic of Indonesia Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning Notary Positions does not regulate and does not require notaries to keep their documents in electronic form, this can be done to reduce all risks and possible worst things for the documents they keep. Media that can be considered to be used as a storage of data or information in accordance with technological developments is one of the storage technologies based on the Cloud Computing System (Paikah, 2023).

Cloud Computing System Concept

According to the National Institute of Standards and Technology U.S Department of Commerce, Cloud Computing is defined as:

Cloud Computing is a model for enabling ubiquitous, convenient, on-demand network access to a shared pool of configurable computing resources (e.g., networks, servers, storage, applications, and ser-


**Figure 1.** Cloud Computing System

vices) that can be rapidly provisioned and released with minimal management effort or service provider interaction. This Cloud model is composed of five essential characteristics, three service models, and four deployment models.

The concept of Cloud Computing is usually considered the internet. Because the internet itself is described as a large cloud (usually in a network scheme, the internet is denoted as a cloud) that contains a set of interconnected computers. The term Cloud Computing was coined to describe a sophisticated computing service that is tailored to customer demand that was initially offered commercially by such service providers such as Amazon, Google, and Microsoft (Syafnidawaty, 2020).

Cloud Computing Service Model

Infrastructure as a Service (laaS)

Provide basic infrastructure services to customers. These services may include physical machines, virtual machines, networking, storage, or some combination of these. Users can then build whatever they need on top of the infrastructure managed by the laaS service provider. The implementation of laaS is used to replace internally managed data centers. They offer a lot of flexibility to companies but at a lower cost. Examples of IaaS service providers are: Amazon EC2, TelkomCloud, BizNetCloud, and so on. The advantage of IaaS is that we don't need to buy a physical computer, and we can easily change the configuration of the virtual machine (scale up/scale down). For example, when the virtual machine is overloaded, we can add CPU, Random Access Memory (RAM), Storage, and more immediately (Andhika's Blog, 2019).

Platform as a Service (PaaS)

This service provides an operating system, platform development and/or database platform. This PaaS allows an organization to develop an application without worrying about how to build the infrastructure needed for it. However, depending on what kind of PaaS implementation is used, users may get limitations in using the tools that can be used to build their applications. If we make an analogy where we rent a "house" and its environment (operating system, network, database engine, application framework, etc.), to run the application we create. We don't need to worry about preparing the "house" and maintaining the "house". The important thing is that the application we make can run well in the "home". For the maintenance of this "house" is the responsibility of the service provider. Examples of these PaaS service providers are: Amazon Web Service, Windows Azure, and even traditional hosting—are examples of Paas. The advantage of PaaS is that we as developers can focus on the applications we create, not having to think about operations from "home" for the applications we create (Andhika's Blog, 2019).

Software as a Service (SaaS)

SaaS provides application services as well as data. Applications, data and all necessary platforms and infrastructure are provided by the service provider. SaaS is the original Cloud service model and to date is still popular and most widely offered by Cloud service providers. Examples of SaaS services are: public email services (Gmail, Yahoo Mail, Hotmail), social networks (Facebook, Twitter, Linkedin), instant messaging (Yahoo Messenger, Skype, Line, WhatsApp) and many others. In its development, many software that used to only be enjoyed by installing the application on a computer (on-premise) can now be enjoyed through the Cloud. The advantage is that there is no need to buy a license and just be connected to the internet to use it. For example, Microsoft Office which we can now enjoy through Office 365, Adobe Suite which can be enjoyed through Adobe Creative Cloud (Andhika's Blog, 2019).

Application of Cloud Computing System to Electronic Notary Protocol

The complexity of activities carried out by Notaries in carrying out their duties and responsibilities requires a qualified office electronic system. This electronic system must be able to manage 3 (three) important things, namely making deeds, financial arrangements and documentation. One of the latest technological developments that can be adopted by Notaries in carrying out their office activities is by using an electronic system based on the Cloud Computing System.

The Notary office management system can be carried out through 2 (two) ways, namely:

Pure manual

The computer in the Notary office is used to prepare draft deeds, store data related to the creation of deeds, and also other data related to the management of the Notary office. The computer used by the Notary must have a capacity that is adjusted to the amount of data stored by the Notary. The data is stored in certain folders according to the wishes of the Notary or Notary assistant who works on the draft deed.

The longer the Notary's working period, the more data must be stored and documented by the notary. So notaries must invest in the procurement of computer equipment with a large storage capacity. In addition, the Notary and his assistant must be able to really manage and maintain the stored data so

that it is neatly organized, so that the existing data is not mixed up and causes chaos and losses for the Notary and his service users.

If something happens to the computer (for example, the computer is affected by a virus, hacked, the hard drive is damaged so it must be reformed) which results in the loss or corruption of the data stored in it, it will make it difficult for the notary to work. Not to mention that the Notary will be dealing with IT experts to repair or perform certain programming on the computer system of the Notary's office which of course will add to the costs that the Notary must incur. In addition, if later the assistant or Notary employee stops working, it will usually be difficult for the Notary to find the documents needed because the one who knows the location is the assistant or employee of the Notary.

The stored data is not necessarily safe because there is a risk of hacking and viruses, and the Notary does not have control or restriction of access by employees to the data stored on the server or computer in the Notary's office.

Manual with App

The meaning here is that the Notary uses an electronic system that he or she wants by storing data on a free application that is in accordance with the wishes and patterns of his office administration arrangements.

The application of the Cloud-based Notary office electronic system was created not only because of the development of increasingly sophisticated technology, but also because Notaries need a solution to the problems that arise when they carry out their duties, especially considering that Notaries are also the CEO in their offices. The problems that arise in general are regarding client data, archives that are

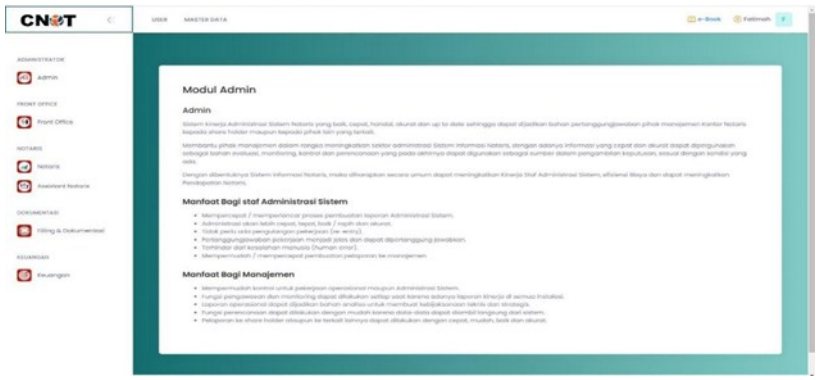


**Figure 2.** CNOT Application View

not well organized, especially if there are so many deed in them, and also financial management problems. The Cloud Computing System-based application initiated by PT. Averin Informatika Teknologi called CNOT is here as a solution to overcome Notary office management. Cloud-based CNOT, the Cloud service model used is Software as a Service (SaaS), where applications, data and all necessary platforms and infrastructure are provided by the service provider, namely PT. Averin Informatics Technology.

CNOT is a Notary and PPAT office application system created by the Indonesian Notary Association (INI) in collaboration with PT Averin Informatika Teknologi in 2018. Previously, this CNOT was called INI-SAN which was established in 2011, which later changed its name and also changed the application system based on the local office system to be based on the Cloud computing system. This CNOT was created in order to assist Notaries in carrying out their duties and responsibilities by using information technology that has developed rapidly (Wahjudin, 2022).

In this CNOT application, it can be seen that this Cloud Computing System-based application has implemented several modules that can be used by Notaries, namely:(Wahjudin, 2022).

Admin Module

This module functions as an administrator module that manages basic data and parameters that

will be used by the program according to the conditions of the Notary concerned

Front Office Module

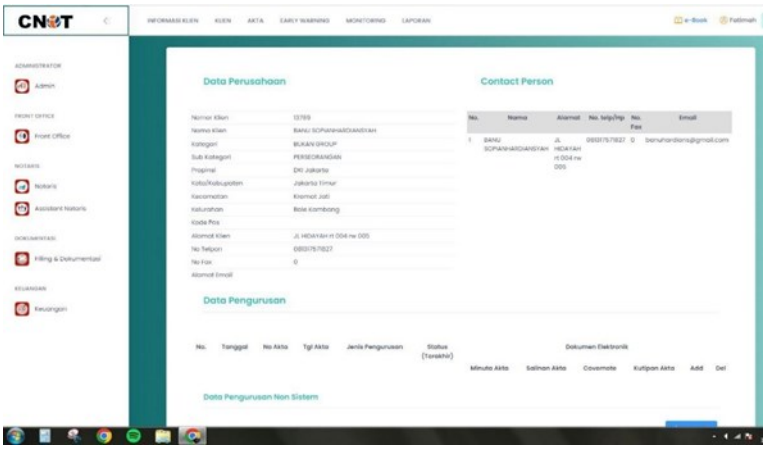


**Figure 3.** Client Data Search Display on Notary Assistant Module

This module functions to manage secretarial applications in the Notary office environment, which includes the management and recording of letters, emails, faxes, guest books, and telephones. In addition, it is also for the arrangement of archives, information centers and meeting records.

Notary Assistant Module

Covers all the needs of the Notary office, namely searching for client documents, client history, making deeds, and others according to the needs of the Notary concerned.

Documentation and System Filling Module

It is a module that stores all documents electronically

Finance Module

This module functions as a financial management management in the Notary's office, so that all financial expenses and income will be recorded

Notary Module

Through this module, the Notary can monitor the entire performance of the Notary office.

If the Notary decides to use this electronic system, the Notary may contact this service provider and register himself or herself as a user to obtain a username and password. To use this service, the Notary must pay a subscription fee according to the platform specified by the service provider.

In accordance with the concept of Cloud which can be accessed from anywhere, including from outside the office, Notaries can access all stored data from anywhere, either through laptops, computers or from their mobile phones, including monitoring the performance of their offices. If the Notary wants his assistant to be able to access one of the modules from outside the office, the Notary can arrange it by contacting the service provider to register a certain IP Address so that it can be connected to the Cloud system. So free access here does not mean without restrictions. Notaries have login data to monitor who accesses data from the Cloud and when. This is one way to secure data stored in the Cloud (Anggraini, 2018).

Data security in this Cloud system is also protected by an encryption system where each Notary who subscribes to this service is given 1 (one) virtual server so that the data between one notary and the other is not mixed and there is minimal threat of risk from the outside which often takes advantage of loopholes in the Cloud in general where 1 (one) server stores the data of several tenants. Although the data is stored on a server owned by the service provider, only the user, namely the Notary and or his assistant, can access the data. In addition, documents are not only encrypted but also stored in Portable Document Format (PDF) where PDF files can be encoded so that to open or edit them, certain key-

words are needed (Anggraini, 2018).

If it turns out that in the future the Notary does not become a Cloud user, then before the Notary unsubscribes, the stored data will be handed over to the Notary and the server will be reformatted so that it can be used by other Notaries (new users). Furthermore, the data will be stored on the service provider's main server for 1 (one) year with encryption so that the data will not be able to be opened by anyone, before being destroyed (Anggraini, 2018).

So, if Notaries use an electronic system based on Cloud computing for their office system, there are several things that are useful for Notaries, namely: (Anggraini, 2018)

This CNOT application is easy to use and Notaries do not need to use IT services in operating this application, but Notaries must pay for a subscription.

The data and documents that the Notary has can be searched easily with this CNOT application.

The Notary office administration system has become more practical and efficient because the CNOT application has provided all its supporting facilities in the modules provided. In addition, it makes it easier for Notaries to monitor the performance of their employees.

This CNOT application can be said to be a backup of data from hard copy data. Because all data owned by the Notary can be entered into this CNOT application.

The data and documents stored in this CNOT application are relatively safe because only a Notary can access them and can be monitored by anyone who accesses this CNOT application.

The printed deed is equipped with a barcode that is connected by the system with the Indonesian Notary Association so as to minimize the risk of forgery of the deed.

Based on the explanation above, it can be understood that the transfer of notary protocols in electronic form is important to implement because notaries in carrying out their obligations to store these documents are safe, effective and efficient. The obligation of notaries to store notary protocols that are carried out electronically by being transferred or stored in electronic storage for now can be said to be a discourse from the government to be implemented, because such storage does not have implementation rules.

The absence of rules regulating the electronic storage of notary protocols in Law of the Republic of Indonesia Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning Notary Positions creates a void in norms. Based on Plato's view that a good state is a country based on good arrangement (law), (Santoro, 2007) Therefore, according to researchers, notary protocols are State archives that must be kept and kept confidential by Notaries who in this case carry out some of the state's duties, so the State should make firm and clear rules that regulate the electronic storage of notary protocols related to the realization of cyber notary in Indonesia.

Good laws and regulations are regulations that provide legal certainty so as to create a safe and peaceful atmosphere in society.

Notary Responsibility for Personal Data of Service Users Who Use Notary Protocol Storage Electronically

The Law on Personal Data Protection is a mandate of Article 28G paragraph (1) of the Constitution of the Republic of Indonesia in 1945 which states that, "Everyone has the right to the protection of themselves, family, honor, dignity, and property under their power, as well as the right to a sense of security and protection from the threat of fear to do or not to do something which is a human right". The issue of Personal Data protection arises due to concerns about the violation of Personal Data that can be experienced by persons and/or legal entities.

The personal data of Notary service users is data that must be protected and confidential. Therefore, regulations related to the confidentiality of personal data have been regulated by the Personal Data Protection Law. Notary is also a position of trust, where the Notary is trusted to hold the secrets of the parties and hold the minuta deed which is a state document. As a trusted official, the Notary should have

trustworthy behavior and be able to maintain that trust.

Notaries as controllers and managers of personal data of their service users are obliged to be responsible for the processing of their clients' personal data. This is as stipulated in Article 47 of the Personal Data Protection Law:

The Personal Data Controller is responsible for the processing of Personal Data and shows accountability in fulfilling the obligation to implement the principles of Personal Data Protection.

The form of responsibility of the notary as the controller and manager of the client's personal data is in Article 12 of the Personal Data Protection Law, namely:

(1) The Personal Data Subject has the right to sue and receive compensation for violations of the processing of Personal Data about him or her in accordance with the provisions of laws and regulations.

(2) Further provisions regarding violations of Personal Data processing and procedures for imposition of compensation as intended in paragraph (1) are regulated in Government Regulations.

The provisions in Article 12 of the Personal Data Protection Law do not fully regulate the procedures for imposing compensation on the responsibility of Notaries as controllers and managers of personal data. However, the provisions of Article 12 of the Personal Data Law are civil liability, namely in the form of compensation, then civil liability applies based on the Civil Code. The provisions in Articles 1366 and 1367 of the Civil Code apply which read as follows:

(1366 Civil Code): Everyone is responsible, not only for the losses caused by his acts, but also for the losses caused by his negligence or recklessness.

(1367 Civil Code): A person is not only responsible for the losses caused by his own actions, but also for the losses caused by the acts of the people he is responsible for or due to the goods under his supervision.

And if it is associated with Law of the Republic of Indonesia Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning Notary Positions, it is not regulated also regarding violations of personal data of Notary service users that are stored as Notary Protocol electronically, then sanctions are applied and applied whose provisions are adjusted to the conventional storage of notary protocols, namely providing administrative sanctions as stipulated in Article 16 paragraph 11 and Article 85 of Law of the Republic of Indonesia Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning the Position of Notary, namely:

a. written warning;

b. temporary dismissal;

c. dismissal with honor; or

d. dishonorable dismissal.

Protection of personal data is one of the interests of the parties that has been guaranteed and is a constitutional right of every citizen. The Notary is obliged to take, store, process and destroy the personal data of the parties in accordance with laws and regulations.

The protection of personal data in the electronic storage of Notary protocols is not regulated in Law of the Republic of Indonesia Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning Notary Positions, so the application of legal liability that it arises is equated with the conventional storage of notary protocols and applies general legal provisions, namely in the form of compensation as regulated by the Civil Code and sanctions administratively to the Notary concerned in accordance with Law of the Republic of Indonesia Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning the Notary Position regulating it.

Based on the analysis and explanation above, the legal responsibility of Notaries for Notary proto-

cols that are stored electronically refers to the theory of legal liability put forward by Kranenburg and Vegtig in the theory of fautes of private personnel that losses to third parties are charged to officials as individuals who have caused losses because of their actions. Based on this theory, the burden of responsibility is directed to the Notary as a person in carrying out his office in the event of a violation related to the storage of Notary protocols stored electronically.

## Conclusion

The application of electronic storage of Notary Protocol based on Cloud Computing System is a manifestation of the advancement of information technology. If it is associated with the concept of cyber notary, which in general can be said that the use of information technology as a support for the implementation of the duties of the notary position, especially in the electronic storage of notary protocols can be carried out in the future. It's just that to implement this, the Notary Position Law needs to provide a clear space regarding the provisions for the assignment, storage and authentication system for notary protocols that have been converted into electronic Notary Protocols. In the absence of regulations that explicitly regulate the electronic storage of protocols, the transfer of electronic data storage can only function as a backup.

The notary as the user of the client's personal data who acts as the controller and manager of the client's data is responsible for the collection, storage, and processing of the personal data as stated in Article 47 of the Personal Data Protection Law. The protection of personal data in the electronic storage of the Notary Protocol is not regulated in the Notary Position Law, so the application of legal liability arising from it is equated with the conventional storage of the Notary Protocol and applies general legal provisions, namely in the form of civil compensation as per Article 12 of the Personal Data Protection Law and Articles 1366 and 1367 of the Civil Code regulating it and administrative sanctions to The notary concerned as in Article 16 paragraph 11 and Article 85 of the Notary Office Law regulates it. Therefore, the legal responsibility of Notaries for Notary protocols stored electronically refers to the theory of legal liability put forward by Kranenburg and Vegtig in the theory of personal fautes that losses to third parties are charged to the official as a person whose actions have caused losses. The burden of responsibility is directed to the Notary as a person in carrying out his position in the event of a violation related to the storage of Notary protocols stored electronically.

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