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Consumer Legal Protection Against Misleading Advertisements in Electronic Transactions of Beauty Products (A Comparative Study Between Indonesia & South Korea)

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Abstract. *This study aims to analyze legal regulations and compare consumer protection mechanisms against misleading advertising in electronic transactions of beauty products in Indonesia and South Korea. The method used is normative juridical research with a comparative legal approach, through a literature review of primary, secondary, and tertiary legal materials, which are then analyzed qualitatively. The results of the study indicate that both countries have a relatively comprehensive legal framework for regulating misleading advertising, but with different characteristics. Indonesia relies on scattered regulations such as the Consumer Protection Law, the Electronic Information and Transactions Law, and supervision by the Food and Drug Supervisory Agency. Meanwhile, South Korea implements a more integrated and proactive system through the Cosmetics Act, the Act on Fair Labeling and Advertising, and the Ministry of Food and Drug Safety, supported by regulations responsive to technological developments such as the regulation of dark patterns, collective dispute resolution mechanisms, and stricter sanctions including reverse burden of proof and potential punitive damages. These findings indicate that although Indonesia has an adequate legal basis, institutional strengthening, regulatory harmonization, and technological adaptation are needed to improve the effectiveness of consumer protection in the digital era.*

Keywords: *Advertising; Consumer; Electronic; Protection; Transaction.*

1. Introduction

E-commerce is one of the most tangible manifestations of internet development. In general, the term e-commerce refers to buying, selling, or payment activities conducted through computers or other electronic devices. One of the impacts of e-commerce is the growth of a highly competitive business climate, which provides many advantages for consumers, such as lower prices and a wider variety of products. E-commerce has also become one of the main drivers of Indonesia's digital industry growth. With the increasing number of internet users and the growing number of business actors shifting their operations to e-commerce platforms, Indonesia is experiencing rapid e-commerce expansion (D Damuri, Y. R., 2021).

In Indonesia, reports from Bank Indonesia indicate that the value of e-commerce transactions reached approximately IDR 487 trillion in 2024, showing a significant increase compared to previous years (The Leap, 2025). This massive growth reflects how society has become increasingly dependent on online platforms for purchasing goods and services (Pusat Data Kontan, 2025). It demonstrates that e-commerce is no longer a minor phenomenon, but rather an essential component of the national trade ecosystem, including the beauty, cosmetics, fashion, and health product sectors.

Electronic transactions have become a major pillar of global economic growth, including within the beauty industry. In Indonesia, the surge in beauty product sales through online platforms accounted for 55% of total cosmetic sales in 2024, based on data from the Indonesian Ministry of Trade in 2024. This phenomenon illustrates a shift in consumer behavior toward digital-based purchasing, which is often accompanied by risks related to the spread of misleading or false product information (I. M. M Januartha, 2024).

Unfortunately, the development of electronic media, particularly in marketing and advertising, is not always accompanied by good faith from business actors (A Perwira, T. H., & Winanti, 2021). Many companies and individuals exploit technological advancements to disseminate misleading advertisements for goods and services. In such advertisements, the information presented is often inconsistent with reality or intentionally exaggerated to attract consumer attention (C. M Pranda, 2022). For example, products are promoted using images that appear more attractive than their actual quality, or information regarding prices and product functions is hidden or disguised using confusing terms. This condition makes consumers vulnerable to deception because they do not receive honest and complete information regarding the products they purchase. The beauty industry has become one of the sectors that most actively utilizes digital platforms to market its products, considering the high market demand for skincare and cosmetic products, particularly among Asian consumers. However, the convenience of electronic transactions also creates specific risks, especially concerning misleading advertising practices that may harm consumers (N. F. A Fernanda, 2025).

The primary motivation behind misleading advertising is the desire of business actors to maximize profits. Consequently, the information provided often appears hyperbolic and claims that the products offered possess superior quality, even though such information frequently does not correspond to the actual promotional promises made to consumers (Sudjana, 2021).

South Korea, with its globally recognized “K-Beauty” industry, is known as a major center and exporter of beauty products worldwide, supported by an innovative industry and strong government backing. In particular, South Korea has become a pioneer in beauty products within the Asian region. The country possesses a relatively advanced and specific regulatory framework, such as the Cosmetics Act, the Act on Fair Labeling and Advertising (AFLA), and strict supervision by the Ministry of Food and Drug Safety (MFDS). Strong law enforcement and high advertising ethics standards in South Korea may serve as a benchmark for consumer protection.

Examples of products widely recognized in the Indonesian market are Laneige and Sulwhasoo.

Both brands are owned by the same parent company, Amorepacific Corporation, a South Korean beauty company operating more than 30 brands, including Laneige and Sulwhasoo (Generis Global, 2024).

Laneige has been relatively consistent in fulfilling the primary promises of its advertisements, namely intensive hydration, skin barrier support, and healthy glowing skin. These claims are not only presented in marketing materials but are also reflected in the performance of their hero products, such as Water Sleeping Mask, Water Bank, and Lip Sleeping Mask, as well as in measurable global purchasing growth. Laneige officially positions Water Sleeping Mask as a product intended to "help skin appear brighter, healthier, and more hydrated through Sleeping Microbiome and Probiotics Complex." This claim is not merely a general slogan because hydration remains the foundation of the brand's overall positioning through its "Advanced Water Science." In the Indonesian market, the product continues to be marketed with promises of deep hydration suitable for all skin types, rather than excessive claims such as instant whitening or extreme anti-aging effects. This demonstrates consistency between advertising messages and realistic cosmetic functions (Grahadi Purna Putra, 2024).

From the perspective of consumer satisfaction and acceptance, Laneige's strength is particularly evident in its global best-selling products, Lip Sleeping Mask and Water Bank/Water Sleeping Mask. According to South Korean industry reports in early 2026, Lip Sleeping Mask sold approximately 20 million units globally within one year, equivalent to one product being sold every two seconds. Such figures indicate high repeat purchases and strong consumer loyalty because sleeping mask products are not one-time purchases but instead depend on users' experiences and perceptions regarding whether the products fulfill their hydration promises (Nurlaily Simatupang, R., Fitri, W., 2026).

In terms of annual purchasing growth, data from Amorepacific, the parent company of Laneige, provides more concrete evidence. In its official 2024 Earnings Summary, Laneige recorded a 127% increase in sales in the Americas during the Black Friday/Cyber Monday period compared to the previous year, alongside strong growth in the Asia-Pacific and European markets through products such as Water Bank, Cream Skin, and Lip Sleeping Mask. This reflects not only heightened awareness but also increased actual purchases across global markets.

More specifically, Korean industry estimates in 2026 reported that Laneige's annual sales reached approximately KRW 730 billion, or around IDR 8.5 trillion, in 2025 and were projected to increase to KRW 800 billion, or around IDR 9.3 trillion, in 2026, representing growth of approximately 9–10%. This indicates a stable upward trend rather than temporary growth. Approximately 90% of the company's revenue derives from international markets, demonstrating global consumer trust in product quality that aligns with South Korea's premium hydration branding.

Similarly, Sulwhasoo builds its advertising and product promises around Korean ginseng as its primary ingredient, which has been scientifically researched for skincare benefits. The brand claims to utilize a 500-hour ginseng processing method alongside specialized biotechnology to maximize the ingredient's effectiveness on the skin. Its products are designed for all skin types but are particularly praised by consumers with mature skin, namely skin showing signs of aging such as fine lines, wrinkles, sagging, or reduced elasticity. Consequently, Sulwhasoo is often regarded as superior in maintaining moisture, firmness, and skin health for consumers seeking anti-aging treatment.

The beauty products produced by Laneige and Sulwhasoo demonstrate that advertising promises, product quality, and consumer satisfaction move in a consistent direction. Therefore, the advertisements of these brands tend to correspond with actual consumer experiences rather than merely constituting marketing dramatization. This also proves that the quality of beauty products is integrated with South Korea's legal system. Consumer trust cannot be separated from the role of the Ministry of Food and Drug Safety (MFDS), which implements a comprehensive legal framework through the Cosmetics Act. This regulation ensures that every product marketed domestically and internationally has fulfilled strict safety and quality standards, thereby ensuring that company advertisements correspond to the physical quality of the products themselves.

In Indonesia, one example of misleading advertising occurred in 2024 involving Makassar-based entrepreneur Mira Hayati, who built her cosmetic business empire not through conventional stores but through the power of social media. She utilized live streaming, personal endorsements, free product distribution, and a network of more than 200,000 resellers across Indonesia. Products such as MH Cosmetic Lightening Skin and MH Cosmetic Night Cream were actively promoted on her personal social media accounts with beauty claims promising rapid results. Ironically, laboratory tests conducted by BPOM revealed that both products contained mercury, a substance explicitly prohibited in cosmetic compositions, and one of the products did not even possess official distribution permits.

Such conduct violated Law No. 8 of 1999 concerning Consumer Protection, particularly Articles 9 and 10, which explicitly prohibit business actors from offering or advertising products using false, misleading, or deceptive information regarding product conditions and safety. Promoting mercury-containing cosmetics as safe whitening products clearly constitutes misleading advertising. Furthermore, Law No. 11 of 2008 in conjunction with Law No. 19 of 2016 concerning Electronic Information and Transactions (ITE Law), particularly Article 28 paragraph (1), prohibits the dissemination of false and misleading information causing consumer losses through electronic media. Social media promotions that fail to clearly disclose harmful product ingredients satisfy the elements of this offense. In addition, BPOM Regulation Number 8 of 2019 concerning Technical Requirements for Cosmetic Labeling was also violated because cosmetic advertisements are prohibited from containing claims that exceed verified contents and efficacy.

Indonesia and South Korea are two countries with dynamic beauty markets but different regulatory approaches. Indonesia already possesses a legal framework through Law No. 8 of 1999 concerning Consumer Protection, Law No. 11 of 2008 concerning Electronic Information and Transactions and its amendments, as well as technical regulations issued by the Food and

Drug Supervisory Agency concerning cosmetic product supervision. On the other hand, South Korea, known as one of the global centers of the Korean beauty or K-beauty industry, has developed a more integrated consumer protection system through the Cosmetics Act, the Act on Fair Labeling and Advertising (AFLA), and the Ministry of Food and Drug Safety (MFDS), which specifically regulates the safety and advertising of beauty products.

A comparative study between Indonesia and South Korea is important in order to identify the strengths and weaknesses of each legal system and to adopt best practices from South Korea that may be implemented in Indonesia. By focusing on electronic transactions involving beauty products, this research aims to provide policy recommendations capable of enhancing consumer protection, reducing the risk of exploitation, and promoting fairer and more transparent e-commerce practices. This issue is highly relevant considering the substantial economic and health risks present in today's digital era (K. K Wahyuningsih, Y. Y., 2025).

Theoretically, the results of this research are expected to enrich the literature on consumer protection law in the digital era, particularly in the context of developing countries facing challenges in online supervision. Practically, this research may serve as a reference for policymakers, e-commerce industry actors, and consumer protection institutions in formulating more effective strategies to address the spread of misleading information regarding online beauty products.

2. Research Methods

This research employs a normative juridical approach oriented toward the analysis of written legal norms. This method aims to identify the applicability of legal provisions through a systematic examination of statutory regulations, expert doctrines, and relevant legal literature, with the objective of analyzing the application of law to concrete events (Peter Mahmud Marzuki, 2017).

This study also utilizes a comparative law approach. Terminologically, a comparative approach refers to a research method conducted by comparing one legal system with another, or by comparing legal regulations with their implementation in practice. In this research, the comparison focuses on the legal regulations of Indonesia and South Korea. All primary, secondary, and tertiary legal materials were obtained through library research and analyzed qualitatively to identify the regulations applicable in Indonesia and South Korea, as well as their juridical implications for consumer legal protection.

3. Results and Discussion

3.1 Legal Regulations Concerning Misleading Advertising in Electronic Transactions of Beauty Products in Indonesia and South Korea

Misleading advertising within the context of Indonesian law refers to any form of information dissemination that is inaccurate, manipulative, or unverifiable, thereby influencing consumer decisions in transactions. In the digital context, misleading advertising is defined as manipulative information constructed by exploiting consumers' weaknesses in understanding information technology, ultimately creating information that harms consumers because they are unable to critically evaluate the benefits of the goods offered, particularly under conditions of limited information (S. Y Putri, C. W., & Wijaya, 2024).

Before assessing the effectiveness of existing legal provisions, it is necessary to first analyze the common forms of misleading advertising occurring in online media, both in terms of content, methods of delivery, and manipulative strategies employed by business actors to attract consumer attention (Syafrida Hifzullah, Wulandari, R., 2025).

Misleading advertisements in online media refer to any form of information delivery that creates false impressions, obscures facts, or conceals important information regarding goods or services. These forms of deception may occur directly or indirectly and are frequently found across various digital platforms such as e-commerce platforms, social media, and commercial websites. Several common forms of misleading advertising in online media include the following (P Winriadirahman, 2024).

1) Overclaiming

This type of advertisement uses expressions such as "most effective," "cheapest," "best in the world," or "the only one in Indonesia" without presenting scientific evidence or official certification that can be legally justified. Such claims aim to shape consumer perceptions so that they believe in the absolute superiority of the product. In fact, Article 9 paragraph (1) letter f of the Consumer Protection Law (UUPK) prohibits business actors from creating or disseminating advertisements containing false, misleading, or exaggerated statements regarding the benefits of goods and/or services.

2) False or fictitious testimonials

Many business actors manipulate customer testimonials through fabricated content or by paying influencers/public figures to provide reviews as though they had actually used the product. In practice, this method creates misleading social impressions that do not reflect real experiences. Such conduct contradicts the principle of honesty in advertising and may be categorized as the dissemination of misleading information as prohibited under Article 28 paragraph (1) of the Electronic Information and Transactions Law (ITE Law).

3) Incomplete or ambiguous information

Certain advertisements contain incomplete information or are intentionally made ambiguous, such as failing to explain promotional validity periods, neglecting to mention additional shipping fees, or omitting risks associated with the use of certain products, especially beauty products. The absence of such information violates consumers' rights to accurate and clear information as guaranteed under Article 4 letter c of the Consumer Protection Law (UUPK).

Juridically, consumer protection against misleading advertising has obtained a strong foundation within the national legal system, particularly through several statutory regulations as follows (Y. Y Sakti, M., Ramadhani, 2017):

1) Law No. 8 of 1999 concerning Consumer Protection (UUPK)

This law constitutes the primary foundation of consumer protection in Indonesia. In the context of advertising, several relevant provisions include:

a) Article 4 letter c, which grants consumers the right to obtain accurate, clear, and honest information regarding the condition and guarantees of goods and/or services. The right to information is an absolute requirement enabling consumers to make rational and legally conscious decisions.

b) Article 8 paragraph (1) letter f, which prohibits business actors from trading goods and/or services that are inconsistent with descriptions, advertisements, or labels. This norm requires consistency between advertising messages and product realities while emphasizing the importance of business actors’ accountability regarding the substance of marketing communications.

c) Article 9, which explicitly prohibits business actors from offering goods and/or services in a false, misleading, or uncertain manner. In practice, this includes prohibitions against fictitious testimonials or superiority claims unsupported by facts.

2) Law No. 11 of 2008 concerning Electronic Information and Transactions (ITE Law) in conjunction with Law No. 19 of 2016

The ITE Law, as a lex specialis in the digital sphere, provides an additional dimension of consumer protection for individuals suffering losses due to misleading electronic information.

a) Article 9 of the ITE Law states:

“Every Business Actor offering products through an Electronic System must provide complete and accurate information relating to contract terms, producers, and offered products.”

b) Article 28 paragraph (1) states:

“Every person intentionally and without authority disseminating false and misleading information causing consumer losses in electronic transactions.”

Within its legal construction, the elements of “without authority” and “misleading” bind business actors from disseminating unfounded promotional content. Violations of this article not only create civil consequences in the form of compensation but may also result in criminal liability if intentional conduct and actual consumer losses can be proven.

3) Government Regulation Number 71 of 2019 concerning the Implementation of Electronic Systems and Transactions (PP PSTE)

This Government Regulation complements previous legal instruments by emphasizing the lawful and accountable implementation of digital transactions. Article 26 paragraph (1) stipulates that Electronic System Operators are obligated to maintain the confidentiality, integrity, authenticity, accessibility, availability, and traceability of Electronic Information and/or Electronic Documents in accordance with statutory provisions. Although this article does not specifically regulate advertising content, the principles contained therein are relevant to consumer protection in the context of the security and reliability of systems used to display information, including advertisements. If electronic systems used by business actors fail to maintain data integrity and authenticity, consumers may receive inaccurate or manipulated information, ultimately harming consumers' rights to obtain truthful and accurate information.

Specifically regarding beauty products, the Food and Drug Supervisory Agency (BPOM) plays a central role. The current technical regulation is BPOM Regulation (PerBPOM) Number 18 of 2024 concerning Technical Requirements for Cosmetic Labeling, Promotion, and Advertising, which replaces PerBPOM Number 30 of 2020 and PerBPOM Number 32 of 2021. This regulation serves as the implementation of Article 425 paragraph (2) of Government Regulation Number 28 of 2024 concerning Implementing Regulations of Law No. 17 of 2023 concerning Health (Badan POM, 2025).

The Head of BPOM emphasized that cosmetic labeling, promotion, and advertising must provide accurate information and must not deviate from factual conditions. Advertising and promotion may only be conducted for cosmetics that have obtained BPOM notification and must not be misleading or excessive. Furthermore, the use of medical personnel or healthcare professionals in cosmetic advertisements is prohibited as part of efforts to protect the public from false information (Kementerian Pendayagunaan Aparatur Negara Dan Reformasi Birokrasi, 2025).

More broadly, cosmetic product advertisements are required to contain truthful information, must not be misleading, and must not include claims exceeding the actual functions of cosmetics. These provisions aim to protect consumers from false or manipulative information in beauty product promotions. In relation to hazardous beauty products, cosmetic products are required to obtain distribution permits and pass BPOM laboratory testing, where labeling, composition, and efficacy claims become the focus of BPOM supervision to prevent consumers from being misled.

South Korean Regulations

Legal regulations concerning misleading advertisements in electronic transactions involving beauty products in South Korea are strictly governed through a combination of the Cosmetics Act and the Act on Fair Labeling and Advertising. South Korea imposes high standards on business actors to ensure that product information provided to consumers is truthful and not exaggerated (ICLG, 2025).

1. Main Legal Foundations

a. Cosmetics Act:

Article 13 prohibits false labeling or advertising that may mislead consumers, including exaggerated claims, medical claims, or misuse of the terms "organic" or "natural" without proper certification.

b. Act on Fair Labeling and Advertising (AFLA) (Act on Fair Labeling and Advertising, n.d.):

The core prohibition under AFLA is stipulated in Article 3, which classifies four categories of prohibited advertisements. No business actor may engage in labeling or advertising practices that fall into the following categories, which may undermine fair trade order by deceiving or misleading consumers, namely (WIPO, 2010):

1) false or exaggerated labeling or advertising;
2) deceptive labeling or advertising;
3) unlawful unfair comparative labeling or advertising; and
4) defamatory labeling or advertising.

c. Korea Fair Trade Commission (KFTC) Review Guidelines (Revised October 2025): The KFTC tightened advertising review guidelines in e-commerce and social media, particularly concerning influencer marketing that fails to disclose compensation.

2. Types of Prohibited Advertisements

The Ministry of Food and Drug Safety (MFDS) specifically prohibits the following types of advertisements:

a. Medical Claims:

Cosmetic products advertised as if they function as medicine, for example claiming to cure skin inflammation.

b. Excessive Result Claims:

Advertisements promising immediate absolute results or unrealistic outcomes, such as "reducing skin age by 10 years."

c. Misuse of Terminology:

The use of terms such as "doctor recommended" or references to human-derived substances (such as exosomes) without valid evidence.

d. **False Organic Appearance**:

Advertisements claiming products are natural or organic despite not meeting the required standards.

3. Regulation of Influencers and E-Commerce

a. **Disclosure Obligations**:

The KFTC requires influencers or endorsers to disclose commercial relationships, such as paid advertisements or free product sponsorships, when reviewing beauty products. Failure to do so is considered misleading advertising.

b. **Platform Responsibility**:

E-commerce platforms are required to take a more proactive role in monitoring and removing illegal cosmetic advertisements that violate regulations.

4. Legal Sanctions and Enforcement

a. **Administrative Measures**:

The MFDS is authorized to request the Korea Communications Standards Commission to block violating sales websites and conduct on-site investigations.

b. **Fines and Corrective Orders**:

Business actors violating the Act on Fair Labeling and Advertising may face substantial fines of up to KRW 200 million and corrective orders.

c. **2025/2026 Developments**:

The MFDS continues to strengthen enforcement measures, including restricting excessive anti-aging claims and blocking misleading social media content.

In a highly significant recent development, South Korea carried out a major reform of its Electronic Commerce Act. Through amendments effective on February 14, 2025, which expanded the scope of regulations addressing dark patterns, the KFTC is now authorized to regulate six additional forms of dark patterns that were previously unregulated. In this context, dark patterns refer to interface design techniques that subtly manipulate consumer behavior. Prior to the amendment, actions such as providing false or exaggerated information, pressuring consumers into transactions, or obstructing cancellation rights through deceptive methods were already prohibited. Under the previous framework, the KFTC had regulated various forms of dark patterns such as fake discounts, fake recommendations, bait-and-switch tactics, disguised advertisements, misleading questions, hidden information, and obstruction of price comparison mechanisms (lexology, 2025).

When comparing the two legal systems above, several significant similarities and differences can be identified. Both countries utilize a combination of general consumer protection laws and sector-specific regulations for beauty products, and both possess supervisory institutions authorized to impose administrative sanctions. Indonesia relies on BPOM for beauty product regulation and utilizes the ITE Law for the digital sphere, while South Korea employs the MFDS for cosmetics regulation and the Electronic Commerce Act specifically designed for digital transactions (F. M Resti Riancana, 2023).

However, there are fundamental differences between the two systems. South Korea possesses regulations that are far more responsive and granular in addressing technological developments, as demonstrated by the explicit regulation of dark patterns since 2025, matters that are not yet explicitly regulated under Indonesian law. Furthermore, the KFTC in South Korea conducts highly active law enforcement with publicly disclosed case examples, whereas law enforcement in Indonesia still faces challenges due to weak field supervision and low levels of public digital literacy. In terms of sanctions, South Korea is moving toward the implementation of punitive damages of up to five times the actual losses for intentional violations, an instrument that has not yet been adopted in Indonesia in the context of misleading advertisements for beauty products in the digital sphere (Toman Sony Tambunan Resmina Sinaga, 2025).

Although the Indonesian legal system already provides a relatively comprehensive framework, several gaps remain. Indonesia already has the Consumer Protection Law, yet the law has not fully accommodated the specific characteristics of digital products, leaving legal loopholes that make consumers vulnerable to losses (Putra, 2024). In addition, legal supervision concerning consumers in the use of beauty products in Indonesia still faces numerous challenges, both in terms of regulation, law enforcement, and public awareness, especially regarding the widespread circulation of illegal products and misleading advertisements on digital platforms, as well as weak field supervision and low levels of public literacy.

3.2 Comparison of Consumer Legal Protection Mechanisms Against Misleading Advertisements in Electronic Transactions of Beauty Products in Indonesia and South Korea

Consumer legal protection against misleading advertisements in electronic transactions involving beauty products in Indonesia and South Korea demonstrates significant differences in implementation mechanisms. Indonesia relies on the Consumer Protection Law (UUPK), the ITE Law, and Government Regulation concerning Electronic Commerce (PP PMSE), supervised by BPOM, the Ministry of Communication and Information (Kominfo), the Ministry of Trade, and the Consumer Dispute Settlement Agency (BPSK). However, the Indonesian system remains fragmented and tends to be reactive, generally responding only after violations occur or consumers submit complaints.

In contrast, South Korea implements a more integrated and preventive system through the Act on Fair Labeling and Advertising (AFLA), with centralized supervision conducted by the Korea Fair Trade Commission (KFTC) and the Ministry of Food and Drug Safety (MFDS). This system requires scientific substantiation of advertising claims, transparency in digital endorsements, and rapid enforcement measures in the form of fines, corrective orders, and criminal sanctions.

The following table presents a comparison of consumer legal protection mechanisms against misleading advertisements in electronic transactions involving beauty products in Indonesia and South Korea.

Tabel 1. Study Comparison

No.	Aspect	Indonesia	South Korea
1.	Main Regulations	Law No. 8 of 1999 concerning Consumer Protection (UUPK); Law No. 11 of 2008 in conjunction with Law No. 19 of 2016 concerning Electronic Information and Transactions (ITE Law); Government Regulation concerning Electronic Commerce (PP PMSE). There is still no specific law regulating beauty-product e-commerce.	Act on Fair Labeling and Advertising (AFLA); Cosmetics Act. Specific regulations governing beauty products and rapidly developing digital advertising.
2.	Prohibition of Misleading Advertisements	Article 9 UUPK prohibits business actors from providing false or misleading information regarding quality, quantity, materials, usefulness, prices, or goods/services guarantees.	Article 3(1) AFLA prohibits false, deceptive, exaggerated, or comparative advertisements that may mislead consumers.
3.	Supervisory/Enforcement Institutions	BPOM (Food and Drug Supervisory Agency); Kominfo (Ministry of Communication and Information); BPSK (Consumer Dispute Settlement Agency).	KFTC (Korea Fair Trade Commission) as the primary authority; Korea Consumer Agency (KCA) for consumer complaints and education.
4.	Specific Regulations on Beauty Products	BPOM Regulation and the 2020 Cosmetic Advertising Ethics Code have not specifically regulated digital advertising and AI.	MFDS regulations (2025) specifically prohibit false reviews, misleading before–after images, the use of terms such as “exosome,” and excessive anti-aging claims.
5.	Sanctions	Criminal penalties of up to 5 years imprisonment and fines up to IDR 2 billion (Article 62 paragraph (1) UUPK); administrative sanctions through BPOM.	Criminal penalties, imprisonment, and fines up to KRW 200 million; corrective orders and active supervision by the KFTC.
6.	Protection Against Digital/AI Advertising	There are no specific regulations yet; regulation under the ITE Law is still general, especially regarding AI influencers and AI marketing.	Regulations already cover deepfake advertising, AI-generated reviews, and direct sanctions against platforms. South Korea is one of the most progressive countries in Asia in this regard.

4. Conclusion

Consumer legal protection against misleading advertisements in electronic transactions involving beauty products in Indonesia and South Korea demonstrates that Indonesia still relies on dispersed regulations, whereas South Korea has established a more specific, integrated, and stringent system. In Indonesia, consumer protection is primarily regulated through Law No. 8 of 1999 concerning Consumer Protection (Articles 9, 10, 17, and 19–28), the Electronic Information and Transactions Law (ITE Law), Government Regulation No. 80 of 2019 concerning Electronic Commerce (PMSE), as well as BPOM supervision regarding cosmetic claims and distribution permits. The protection mechanism is both repressive and preventive in nature; however, its enforcement is often hindered by fragmented regulations, weak inter-agency coordination, and the continuing circulation of illegal cosmetics and misleading advertising within online marketplaces. In contrast, South Korea implements stronger consumer protection through the Cosmetics Act and the Act on Fair Labeling and Advertising, with centralized supervision conducted by the Ministry of Food and Drug Safety (MFDS) and the Korea Fair Trade Commission (KFTC). South Korean regulations not only govern product safety but also specifically prohibit exaggerated claims and deceptive online advertising, while imposing stricter administrative, civil, and criminal sanctions. This system is further strengthened through pre-market control mechanisms, digital monitoring, and more detailed advertising transparency obligations. Recent comparative studies conclude that South Korea is more advanced because it possesses specific cosmetic legislation and a more systematic supervisory framework compared to Indonesia. Indonesia primarily focuses on general consumer protection combined with sectoral supervision, whereas South Korea excels through specialized cosmetic regulations, active digital supervision, and faster enforcement against misleading advertisements. Therefore, Indonesia may strengthen consumer protection in beauty-product e-commerce by adopting aspects of the South Korean model, particularly through more specific and integrated cosmetic regulations. South Korea's advantages in specialized digital regulation, consistent active enforcement by the KFTC, and preparedness in addressing AI-based advertising make it an important reference for legal reform in Indonesia.

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