



## OJK Targets Financial Aggregators in Latest ITSK Regulation

Following its regulation on innovative credit scoring in late 2024, Indonesia's Financial Services Authority ("**OJK**") has continued to expand its oversight of digital financial innovation (*Innovasi Teknologi Sektor Keuangan* or "**ITSK**"). The latest development is OJK Regulation No. 4 of 2025 on Financial Services Aggregation ("**FSA**") Providers ("**OJK Reg. 4/2025**").

The new regulation casts a wide net, applying not only to traditional aggregators, but also to other ITSK clusters involved in aggregation activities, such as financing agents, funding agents, and wealth tech platforms. This advisory outlines the general key provisions of OJK Reg. 4/2025 relevant to businesses engaged in FSA activities.

### Scope of FSA Activities

Under OJK Regulation No. 4/2025, FSA activities include collecting, filtering, and/or comparing information on financial products or services offered by financial services institutions or other financial sector players. FSA Providers are defined as entities that carry out these activities through internet-based electronic systems.

More specifically, FSA Providers may engage in the following activities:

1. Displaying information on financial products and/or services and providing options to consumers; and/or
2. Providing services in the form of:
  - a. Forwarding prospective consumer information to financial services institutions and/or parties conducting activities in the financial services sector;
  - b. Distributing financial products and/or services to consumers; and/or
  - c. Administering documents related to financial products and/or services for the benefit of consumers and financial services institutions or other financial services sector participants.

Note that a party conducting activities similar to those of an FSA Provider will not be deemed an FSA Provider if the aggregation activities are:

1. Conducted to support its main business activities (not related to the FSA);

2. Intended solely for internal use by the company or its group of companies;
3. Carried out by a party already supervised by the OJK in a different sector; or
4. Not intended for the marketing or distribution of products or services of a financial services institution or other financial services sector entity.

FSA Providers may also offer specific products and/or services in cooperation with financial services institutions and/or other parties in the financial services sector (e.g., through co-branding arrangements).

OJK Reg. 4/2025 further allows FSA Providers to conduct business activities beyond those listed above. In practice, many ITSK providers operate across multiple ITSK clusters, but going forward, FSA Providers must obtain the OJK's approval before doing so.

FSA are also prohibited from engaging in the following activities:

1. Conducting fundraising, fund distribution, fund storage, and/or managing consumer funds, except for receiving and forwarding transactions to partners via payment service providers.
2. Engaging in practices that result in unfair business competition, as governed by the applicable anti-monopoly and unfair business competition laws and regulations.
3. Providing aggregation services in the form of user-generated content platforms or copying content without cooperation with the relevant institutions or parties operating in the financial services sector.
4. Providing misleading explanations or exaggerated claims about financial service products offered by financial services institutions or other parties in the financial services sector and offered by the FSA Provider.
5. Guaranteeing or promising investment returns or certain benefits from financial service products offered by financial services institutions or other parties in the financial services sector through the FSA Provider.
6. Receiving power of attorney from consumers to carry out transactions.
7. Illegally leaking and/or misusing consumers' personal data or other consumer information.

### **Form of Legal Entity and Capital Requirements**

All FSA Providers must be in the form an Indonesian limited liability company (*perseroan terbatas* –“PT”) and have a minimum paid-up capital of IDR500 million (approximately USD30,400). However, we understand that this requirement applies only to local FSA Providers (without foreign ownership). In our view, the minimum paid-up capital of IDR10 billion requirement for PT with foreign ownerships (PT PMA) still prevails over the paid-up capital threshold under OJK Reg. 4/2025.

Interestingly, OJK Reg. 4/2025 now provides the OJK with the right to determine different paid-up capital requirements from those set out in the regulation, based on “certain considerations”. The elucidation to the regulation suggests that these considerations may include, among others, adjustments to the paid-up capital deemed necessary to strengthen or improve an FSA Provider's operations.

Furthermore, the paid-up capital must be fully paid in cash and deposited in the name of the FSA Provider with a commercial bank, a commercial syariah bank, or the syariah banking unit of a commercial bank in Indonesia.

### **Foreign Ownership Limitation**

Previously, companies conducting FSA activities were not subject to any foreign ownership restrictions due to their status as ITSKs. Under OJK Reg. 4/2025, foreign ownership in an FSA Provider is now capped at 85% (whether held directly or indirectly). This foreign ownership restriction does not apply to FSA Providers that are publicly listed companies. The regulation also explicitly prohibits nominee arrangements in the ownership structure of FSA Providers.

Existing ITSK providers conducting FSA and registered with the OJK before the issuance of OJK Reg. 4/2025 must comply with this new restriction within one year of obtaining their FSA Provider license.

### **Board Requirements**

OJK Reg. 4/2025 introduces additional requirements for the composition of the board of directors (“**BOD**”) and board of commissioners (“**BOC**”) of FSA Providers. Each FSA Provider must have at least two directors and one commissioner. At least one director must have knowledge and/or experience in or more of the following areas:

1. FSA;
2. The information technology sector; and/or
3. The financial services sector.

The director’s knowledge and/or experience must be proven through certification or at least three years of work in the relevant sectors. Both BOD and BOC members are required to undergo a fit and proper test conducted by the OJK.

In addition, directors may only hold concurrent positions as a director, commissioner, or executive officer in a non-profit company, organization, or institution.

### **Licensing for Prospective FSA Providers and Existing ITSKs Conducting FSA**

Prospective FSA Providers no longer have to go through the OJK’s convoluted regulatory sandbox process, which remains applicable to other ITSKs which are not yet specifically regulated by the OJK. With the issuance of a dedicated regulation governing FSA, prospective FSA Providers may now apply directly to the OJK for a business license. The precise licensing requirements and process are detailed in OJK Reg. 4/2025.

Furthermore, OJK Reg. 4/2025 reinforces the requirement for FSA Providers to obtain an Electronic System Operator Registration Certificate from the Ministry of Communication and Digital Affairs. FSA Providers are prohibited from conducting FSA business activities until this requirement is met. The OJK also has the right to revoke the FSA business license if this condition is not fulfilled. Additionally, FSA Providers must locate their data center and disaster recovery center within Indonesian territory.

OJK Reg. 4/2025 also sets out transitional provisions for existing ITSK providers engaged in FSA (such as aggregators, financing agents, funding agents and wealth tech platforms). The following table outlines the required actions and deadlines.

Parties	Pending Actions	Deadline
Aggregators, financing agents, funding agents and wealth tech platforms that passed the OJK regulatory sandbox before the issuance of OJK Reg. 4/2025.	Apply for an FSA Provider License to the OJK.	21 February 2026
Aggregators, financing agents, funding agents and wealth tech platforms that passed the OJK regulatory sandbox and are in the process of ITSK registration but have not obtained proof of registration before the issuance of OJK Reg. 4/2025.	Continue the ITSK registration and apply for an FSA Provider License to the OJK.	21 February 2026
Anyone who conducts FSA before the issuance of OJK Reg. 4/2025.	Apply for an FSA Provider License to the OJK.	21 February 2026

## Conclusion

The issuance of OJK Reg. 4/2025 is a significant step in the ongoing formalization of the ITSK ecosystem, particularly for FSA activities. Businesses in this field must now comply with more structured regulatory requirements, including limitations on foreign ownership, minimum capital thresholds, and stricter board composition standards.

Importantly, FSA Providers may now apply directly for a business license without going through the OJK regulatory sandbox, signaling OJK's recognition of FSA as a mature and distinct category. Existing ITSK players conducting FSA activities must transition within the prescribed timeline. FSA Providers should assess their readiness and act promptly to comply with the new regulation.

### ABOUT M&T ADVISORY

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