

## ABSTRACT

The development of *e-commerce* platforms has led to the use of *dark patterns* as interface designs that may influence user choices and competition. The research problem lies in the unclear application of Article 25 of Law Number 5 of 1999 to *dark patterns* on *e-commerce* platforms as a potential form of abuse of dominant position, as well as the absence of specific parameters for assessing their impact on competition. This condition creates uncertainty in determining the boundaries of *dark patterns* as a strategy of unfair business competition on *e-commerce* platforms. This research employs normative legal research using statutory, conceptual, and comparative approaches, with qualitative analysis of primary, secondary, and tertiary legal materials. The results show that Article 25 can encompass *dark patterns* through an effects-based approach, but its application remains reactive and case-dependent. Identification is conducted through six parameters, including dominant position, manipulative design, undue advantage, effects on visibility and market access, effects on competition, and efficiency justifications. Germany adopts an *ex ante* approach, while the United States emphasizes an *ex post* approach. Indonesia needs to strengthen Article 25 guidelines with proportional parameters for assessing *dark patterns* on *e-commerce* platforms.

**Keywords: Dark Patterns, E-Commerce, Business Competition**