



Identomat

COMPLIANCE GUIDE

Travel & Hospitality Compliance in Poland

COUNTRY **Poland**

INDUSTRY **Travel & Hospitality**

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KEY REGULATORS **Ministry of Sport and Tourism · Border Guard · President of the Personal Data Protection Office**

Key takeaways

- Hotels, tour operators and online travel sellers in Poland are not covered by the anti-money laundering (AML) law, so there is no legal duty to run bank-style customer checks on travellers. Currency exchange is the exception: it is covered and needs a separate registration.
 - Polish law does not require hotels to register or ID-check guests for the authorities. Guests register their own stay with the municipality, and short-stay foreigners (30 days or less) are exempt.
 - Holding on to a guest's Polish ID card without a legal basis is an offence, and copying ID documents needs a clear purpose under data protection law. Design check-in to read data, not to keep documents.
 - Online is not a loophole: anyone selling package holidays to Polish customers, including through a website or app, must be in the tour operator register and hold insolvency protection.
 - Short-term rentals are about to change: a law creating a central register of accommodation and requiring a registration number on booking-platform listings passed the Sejm (lower house) in October 2026 and is not yet law.
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Poland is open to online travel businesses, and identity rules for the sector come from border, passenger-data and consumer law rather than financial crime law. The principal authorities are the Ministry of Sport and Tourism, the voivodeship marshals who keep the tour operator register, the Border Guard and the President of the Personal Data Protection Office (UODO).

The biggest obstacle for a new entrant is not identity verification but licensing and data discipline: tour operators must register and fund insolvency protection before selling, and accommodation providers that collect more guest data than they need run straight into data minimisation rules.

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1 Who regulates this sector

Authority	Remit	Level	Official site
Ministry of Sport and Tourism	Tourism law, central record of tour operators, short-term rental reform	National	gov.pl/web/sport
Voivodeship marshals	Tour operator register and penalties; categorisation of hotels	Regional (16 voivodeships)	Each voivodeship office
Municipal heads (wójt, mayor)	Register of other accommodation; residents' registration of stay	Local	Each municipality
Insurance Guarantee Fund (UFG)	Tourist Guarantee Fund and the contract-list system	National	ufg.pl
Border Guard	Border checks, Entry/Exit System, passenger data unit, carrier penalties	National	strazgraniczna.pl
President of the Personal Data Protection Office (UODO)	GDPR supervision, including guest and biometric data	National	uodo.gov.pl
National Bank of Poland	Register of currency exchange activity	National	nbp.pl

The Office of Competition and Consumer Protection (UOKiK) enforces general consumer law against online travel sellers, and the Civil Aviation Authority supervises air carriers.

2 Licensing and authorisation

Tour operators and linked travel arrangements

Organising package travel or facilitating linked travel arrangements is regulated business activity that requires entry in the register of tour operators and traders facilitating linked travel arrangements, kept by the marshal of the voivodeship where the business has its seat (Act of 24 November 2017 on Package Travel and Linked Travel Arrangements, Art. 22 and 23). A trader with no seat or branch in Poland chooses the marshal. The same Act applies its insolvency rules to traders established outside the EU that sell to, or direct their activity at, Polish customers (Art. 8(1)).

Registered traders must hold insolvency protection (a bank or insurance guarantee or a trust account), pay contributions to the Tourist Guarantee Fund, and keep a list of contracts in, or report it monthly to, the UFG system (Art. 7 and 9). From 1 July 2026 the list records the contract subject, prices, destinations, charter flights, ICAO airport codes and whether prepayments are taken; it records the number of travellers, not their identities.

Accommodation

A hotel, motel, guesthouse, campsite or hostel must be assigned a type and category by the voivodeship marshal before it starts providing services, and other accommodation (including rooms let by farmers) must be notified to the municipal register (Act of 29 August 1997 on Hotel Services and the Services of Tour Leaders and Tourist Guides, Art. 35 to 39). There is no national licence for accommodation booking websites.

Currency exchange

Currency exchange (działalność kantorowa) is regulated activity that requires entry in the register of currency exchange activity kept by the President of the National Bank of Poland, with clean criminal records for owners, managers and beneficial owners (Act of 27 July 2002, Foreign Exchange Law, Art. 11, 12 and 15). Banks are outside these rules.

Identity framework (AML rules do not apply)

Accommodation providers, tour operators, travel agents and online travel platforms are not obliged institutions under Art. 2(1) of the Act of 1 March 2018 on Counteracting Money Laundering and Terrorist Financing. Two travel-adjacent activities are covered: currency exchange businesses (Art. 2(1)(11)) and traders that accept or make cash payments for goods of EUR 10,000 or more, in one or linked operations (Art. 2(1)(23)). Because point 23 refers to goods, selling accommodation or trips does not bring a travel business into scope. A travel business that runs a currency exchange counter is an obliged institution for that activity and must apply customer due diligence, report to the General Inspector of Financial Information (GIIF) and keep records.

For everyone else, identity in travel is governed by three separate frameworks:

Border and carrier law

Air, sea and scheduled international coach carriers must ensure foreigners hold a valid travel document and any required visa before carrying them to the border (Act on Foreigners, Art. 459).

Passenger data

Airlines send passenger name record (PNR) data to the Border Guard's Passenger Information Unit for flights to or from Poland (PNR Act, Art. 5 and 6).

Residence registration

Guests register their own stay with the municipality; the duty sits with the person, not with the host (Population Records Act, Art. 27 and 41).

Sanctions screening is a general obligation: EU restrictive measures apply directly to every business, and the Minister of the Interior and Administration keeps a national list under the Act of 13 April 2022.

Identity verification and onboarding

Accepted documents

A Polish identity card proves identity and citizenship and is valid for crossing borders within the EU and EEA (Act of 6 August 2010 on Identity Cards, Art. 4). Its electronic layer holds the holder's data, facial image and fingerprints (Art. 12a). The mObywatel document in the

government app has the same effect wherever a law requires identity to be established from an identity document, but it is not valid for crossing a border (Act of 26 May 2023 on the mObywatel Application, Art. 7(4) and (5)). A person shown or sent a mobile document can confirm it by checking its data, the ministry's electronic seal or the user's signature (Art. 9). Foreigners identify themselves with a passport or, for EU, EEA and Swiss citizens, a national identity card.

When identity must be checked

No Polish statute requires a hotel, rental host or travel agent to verify a guest's identity. Hotels may still choose to check identity for security or payment reasons, but that choice must rest on a GDPR legal basis and collect only the data needed. Retaining another person's Polish identity card without a legal basis is a petty offence punishable by restriction of liberty or a fine (Identity Cards Act, Art. 79(2)), which rules out holding ID cards as a deposit.

Residence registration

Polish citizens register a stay away from home only after three months (Population Records Act, Art. 25(4) and 27). EU, EEA and Swiss citizens register within 30 days; other foreigners register by the fourth day after arrival, but all foreigners are exempt if their stay does not exceed 30 days (Art. 41 and 42(2)). Registration can be done electronically with a qualified, trusted or personal signature (Art. 28).

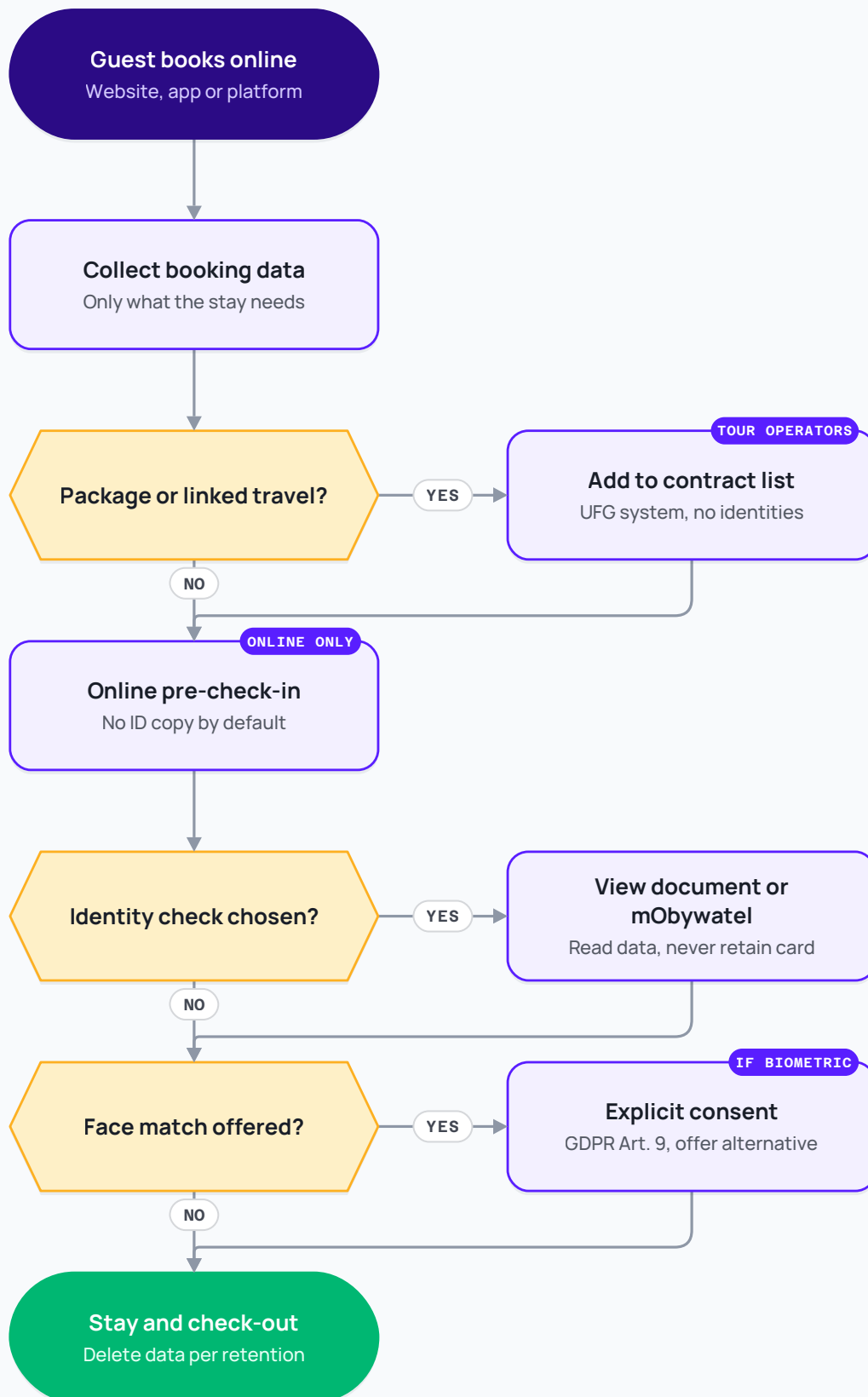


Figure 1. Online booking and contactless check-in for accommodation and travel in Poland.

Bottom line: the rules are channel-neutral for guests and travellers, but online accommodation listings are the one area where a digital-only obligation is arriving: platforms will need to show and check an accommodation registration number.

Requirement	In person / land-based	Online / remote	Difference
Guest identity check by the provider	No statutory duty	No statutory duty	Same
Registration of the guest's stay	Guest's own duty at the municipality	Guest's own duty, can be filed electronically	Same
Polish digital ID (mObywatel)	Equivalent to the ID card when shown	Can be sent for verification of its data and seal	Same
Tour operator registration and insolvency protection	Required for agency sales	Required; websites count as points of sale	Same
Accommodation registration number on listings	Not applicable	Required on platform listings once the national register exists	Differs
Passenger data to the Border Guard	PNR sent for flights to or from Poland	Same data, whichever booking channel	Same
Carrier document checks for foreigners	Required before carriage	Required before carriage	Same

Online sale of package travel

The Package Travel Act defines a point of sale to include websites and similar online sales facilities (Art. 4), so a booking site or app that combines services into a package is a tour operator with the same registration, insolvency protection and contract-list duties as a high-street agency. Non-EU sellers directing offers at Poland are caught by Art. 8(1).

Short-term rental platforms

Regulation (EU) 2024/1028 on short-term rental data has applied since 20 May 2026. Where a member state runs a registration procedure, platforms must collect and display each unit's registration number, check it, and send activity data to authorities. Poland's implementing law **Passed by the Sejm, before the Senate** creates the Central Register of Tourist Accommodation (CWTON), gives every unit an identification number that must appear in listings, and makes short-term rental of up to 30 days a hotel service. Until it is enacted, Poland has no registration number for platforms to check.

Contactless check-in

No Polish rule specifies how online check-in must work, so the design is set by GDPR: data minimisation, a clear legal basis and explicit consent for any facial matching.

6 Data protection and biometrics

The GDPR applies directly, supplemented by the Act of 10 May 2018 on the Protection of Personal Data, which makes the President of UODO the supervisory authority. For travel businesses the practical points are specific:

- **No legal duty to collect ID data.** Because no Polish statute requires hotels or agents to record identity documents, copying or scanning them must be justified as necessary for a stated purpose under GDPR Art. 6 and 5(1)©; "just in case" copies are hard to defend.
- **Biometric check-in.** Facial matching to identify a guest processes biometric data, which GDPR Art. 9 prohibits unless an exception applies. In a commercial check-in the realistic exception is explicit consent, which requires a genuine non-biometric alternative.
- **Passenger data.** Airlines must tell passengers at booking or ticketing that PNR data is sent to the Border Guard and explain their rights (PNR Act, Art. 9).
- **Retention.** The Border Guard keeps PNR data for 5 years for non-EU flights and 3 years for intra-EU flights, and masks directly identifying data after 6 months (PNR Act, Art. 32 and 33). Businesses set their own retention for guest data, which must be limited to the purpose.

Passenger name records

An air carrier operating a flight that crosses the border and takes off or lands in Poland sends the PNR data it collects to the Passenger Information Unit, a Border Guard unit, 48 to 24 hours before departure and again once boarding closes (PNR Act, Art. 5 and 6). Since the amendment in force on 10 September 2025, data on intra-EU flights may be processed only during a declared terrorism alert or for flights designated by the interior minister or approved for a specific case (Art. 4a).

Border checks and the Entry/Exit System

The EU Entry/Exit System (EES), which records biometric entry and exit data of non-EU short-stay travellers at the external border, started operations on 12 October 2025 (Commission Implementing Decision (EU) 2025/1544) with a 180-day progressive roll-out under Regulation (EU) 2025/1534. Carriers bringing foreigners by air, sea or scheduled international coach must check travel documents and visas (Act on Foreigners, Art. 459) and must return travellers refused entry (Art. 460).

Insolvency protection and traveller funds

Tour operators must finance the Tourist Guarantee Fund and keep their insolvency protection current, filing it with the marshal at least 14 days before the previous guarantee expires (Package Travel Act, Art. 7). Since 1 January 2026 protection may be split across several guarantees, with one guarantor named to handle traveller claims (Art. 7(2a)).

8 Risk indicators and red flags

IDENTITY AND FRAUD INDICATORS IN TRAVEL

- **Document mismatch:** travel document data that does not match the booking name or visa, the core carrier risk under the Act on Foreigners.
- **Unregistered package seller:** a site selling packages to Polish customers that does not appear in the tour operator register.
- **Missing registration number:** short-term rental listings without a unit number once the national register applies.
- **Cash-heavy currency exchange:** large or repeated cash exchanges, which bring AML duties at the exchange counter.
- **Forged mobile ID:** an mObywatel screen shown without verification of its data or electronic seal.
- **Over-collection:** front desks photographing or keeping ID cards, which creates data breach and petty offence exposure.

9 Enforcement and penalties

Breach	Penalty and basis	Imposed by
Tour operator breaching Art. 7 conditions or EU passenger rights rules (ship and coach)	Administrative fine up to PLN 50,000 or PLN 30,000 (Package Travel Act, Art. 55)	Voivodeship marshal
Selling packages without registration or insolvency protection	Fine, restriction of liberty or up to 3 years' imprisonment, including for board members (Art. 59 and 60)	Criminal courts
Carrier bringing a foreigner without valid documents	EUR 3,000 to 5,000 per person, capped at EUR 500,000 per group (Act on Foreigners, Art. 462)	Border Guard post commander

Late or incomplete PNR transmission	PLN 20,000 per deadline missed; PLN 12,000 or 16,000 per flight for incomplete or wrong-format data; reductions for quick correction (PNR Act, Art. 64 and 65)	Border Guard
Retaining another person's ID card	Restriction of liberty or fine (Identity Cards Act, Art. 79)	Petty offence courts

Tour operators can also be struck off the register and barred for 3 years for gross failures to pay Tourist Guarantee Fund contributions or keep the contract list, on the UFG's request (Package Travel Act, Art. 30(7) and 31). Data protection breaches fall under the GDPR's turnover-based fines.

10 Recent changes and what to watch

- **October 2026:** short-term rental law **Passed by the Sejm, before the Senate**. Hosts will need a CWTON entry and a unit number shown on listings; most provisions are set to apply 14 days after publication, and municipal and building-level bans from 1 January 2028.
- **11 August 2026:** package travel vouchers **In force**. Operators may offer a one-year voucher instead of a refund when unavoidable circumstances cancel a trip, with the traveller's consent (Dz.U. 2026 poz. 1006).
- **1 July 2026:** expanded contract list **In force**. New data fields, monthly reporting to the UFG and strike-off for persistent failures (Dz.U. 2025 poz. 1806).
- **20 May 2026:** EU short-term rental data regulation **Applies, national register pending**. Platform duties bite in Poland once the national registration procedure exists.
- **12 October 2025:** Entry/Exit System **In force**. Biometric registration of non-EU travellers at Poland's external borders.
- **10 September 2025:** PNR amendment **In force**. Intra-EU flight data processed only on threat-based designation; shorter retention.
- **ETIAS:** travel authorisation for visa-exempt travellers **Adopted, start date not yet set**. No Commission decision fixing its start date has been published (as of October 2026).

What this means for identity verification

For accommodation and travel sellers, identity verification is a business choice, not a statutory duty, so every check must be justified by purpose: fraud prevention, payment security or a safety policy. Read and record only the fields needed, avoid keeping document images by default, and never hold a Polish ID card. Accept the mObywatel document as equivalent to the card, and verify it through its data or electronic seal rather than by looking at the screen.

Facial matching at check-in requires explicit consent and a non-biometric alternative. Platforms listing short-term rentals should prepare to capture and validate Polish unit registration numbers once the CWTON law is enacted. Carriers remain the one group with hard document-checking duties, backed by per-passenger fines. A travel business that runs currency exchange must treat that counter as a full AML-obliged activity.

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How Identomat helps

Identomat runs identity verification, screening and monitoring for regulated businesses on one platform, with workflows you configure for each market. For the requirements in this guide, that means:

- ID document capture and verification, including NFC chip reading of passports and ID cards, for online pre-check-in.
- Face match with biometric liveness for consent-based contactless check-in.
- Configurable no-code workflows that collect only the data each check-in or booking needs.
- AML screening against sanctions lists, and full KYC onboarding for currency exchange activity.
- KYB verification of hosts and travel partners on booking platforms.

[Request a meeting](#)

DISCLAIMER

This article is intended for informational purposes only and does not constitute legal advice. It is a compilation of information from various sources and reflects the information available as of the last updated date indicated

above. Laws, regulations, and regulatory guidance may change, so readers should consult qualified legal professionals for advice specific to their circumstances.

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