Identomat

COMPLIANCE GUIDE

Travel & Hospitality Compliance in Armenia

COUNTRY Armenia

INDUSTRY Travel & Hospitality

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KEY REGULATORS Ministry of Economy · Tourism Committee · Ministry of Foreign Affairs and International Trade

Key takeaways

- Hotels, guesthouses, tour operators, travel agents and tour guides do not need a licence in Armenia, but they must file a notification before they start trading. Operating without one is an administrative offence (fine of AMD 15,000 to 30,000) and a crime where it causes large-scale damage.
- Travel and hospitality businesses are not covered by Armenia's anti-money laundering (AML) law, so there is no formal customer due diligence rule. The exception is any business that buys and sells foreign currency, which is covered.
- Identity data is still mandatory: hotels must keep a register of guests (failing to collect the required information can bring a fine of AMD 100,000), and tour operators and travel agents must keep an electronic register of consumer contracts that records each customer's identity document series and number.
- Selling online adds duties rather than removing them: tour operators selling online need an Armenian-language website with set content, and hotel listings on booking platforms must show all-in prices and check-in and self check-in arrangements, with terms that explain how guest data is collected and deleted. Contracts may be concluded online.
- Biometric data (for example a selfie for contactless check-in) may be processed only with the guest's consent and after notifying the Personal Data Protection Agency of the Ministry of Justice. Guest data may be sent abroad without permission only to countries covered by a treaty or on the Agency's 53-country adequacy list; elsewhere its permission is needed.

Armenia's travel market is open to online and offline businesses alike. Entry is by notification under the Law on Notification on Implementation of Activities rather than by licence, and a new electronic register run by the Tourism Committee (in force since 1 July 2026) publishes who is entitled to trade.

The Ministry of Economy and the Tourism Committee regulate the sector under the Law on Tourism, in force since 1 September 2024. The Ministry of Foreign Affairs and International Trade runs the e-Visa system, the Migration and Citizenship Service handles residence, and the National Security Service operates border control and its passenger data system.

The biggest obstacle for a new entrant is the volume of new secondary rules issued since 2024 on registration, online sales, advertising and qualification, several of which took effect in 2026, plus implementing acts that are still missing, notably the procedure for the hotel guest register and the rules for the outbound-tour guarantee.

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1 Who regulates this sector

Regulator	Remit	Level	Official site
Ministry of Economy (state authorised body in tourism)	Tourism policy; ministerial orders under the Law on Tourism (the guest register and hotel internal-rules orders are still pending)	National	mineconomy.am
Tourism Committee of the Ministry of Economy	Electronic register of tourism service providers; drafts secondary rules; examines tourism offences	National	Law on Tourism, art. 6
Market Surveillance Inspection Body	Imposes fines for breaches of the Law on Tourism	National	Code of Administrative Offences, art. 244.7
Ministry of Foreign Affairs and International Trade (renamed 1 September 2026)	Entry visas, including electronic visas (e-Visa) (Law on Foreigners, art. 8(4))	National	evisa.mfa.am
Migration and Citizenship Service (Ministry of Internal Affairs)	Passports, residence status, registration at place of residence	National	migration.mia.gov.am

National Security Service (border control)	Border crossing and the Border Electronic Management Information System	National	Government Decision 884-N
Personal Data Protection Agency of the Ministry of Justice	Acts independently (art. 24(2)); enforces the Law on Protection of Personal Data, receives biometric processing notifications, approves transfers abroad	National	moj.am
Central Bank of Armenia	Authorised body under the AML law (covers currency exchange); Financial Monitoring Center (FMC)	National	cba.am

2 Licensing and authorisation

The Law on Tourism («Զբոսաշրջության մասին», HO-4-N, adopted 22 December 2023) `In force` replaced the 2003 tourism law on 1 September 2024. Article 10 lists the tourism service providers: hotel service providers, tour operators, travel agents, tour guides, escorts and tourist bus operators. The first five must file a notification under the Law on Notification on Implementation of Activities, whose table of notifiable activities lists tour operator, travel agent, hotel service, tour guide and escort activities under tourism. Article 20 of the Law on Tourism prohibits providing those services without a notification.

Registration with the Tourism Committee is digital. Under Government Decision 136-N of 12 February 2026 `In force from 1 Jul 2026`, providers submit, through the Tourism Committee's platform and at the same time as notifying, the services they offer, the brand names they use on social or other platforms (with Russian and English equivalents), room and bed counts for hotels, and any foreign licences or certificates. The Committee publishes each provider's name, tax number, services and any suspension or termination.

Conditions for tour operators and agents

Government Decision 76-N of 23 January 2025 sets the requirements: a tour operator's head (or collegial executive body) must have at least three years of experience in tourism services and relevant education, and the operator must employ at least one person besides the executive. An operator or agent selling outbound tours must lodge an irrevocable guarantee from a bank, credit organisation or insurer licensed in Armenia (Law on Tourism, art. 15). Agents selling only an operator's packages are exempt. The

guarantee's form, amount and claims procedure are left to a Government act that the law required by 1 September 2024 (art. 27(6)); that act has not been adopted. The Ministry of Economy put a bill to extend the deadline out for consultation in 2024, but it has not been enacted Proposed. Decision 136-N switches on the register's guarantee field only once the act takes effect.

3 Identity framework (AML rules do not apply)

Article 3(1)(4) of the Law on Combating Money Laundering and Terrorism Financing (26 May 2008, last amended by HO-389-N of 13 November 2025) lists the reporting entities. Hotels, tour operators, travel agents and carriers are not among them, so they have no statutory customer due diligence, beneficial ownership or suspicious transaction reporting duty. Persons engaged in buying and selling foreign currency are listed (point "c"); a hotel or agency that exchanges currency becomes a reporting entity for that activity.

Identity in the sector is governed instead by three sets of rules:

Guest register

Every hotel service provider must keep a register of data on persons using accommodation services (Law on Tourism, art. 22, in force from 30 June 2025). The Minister of Economy was due to approve the procedure by May 2025 (Prime Minister's Decision 500-A of 29 May 2024); no such order has been published, so the law does not yet fix the fields, form or retention period.

Contract register

Tour operators and travel agents must keep, electronically, a register of tour package contracts with consumers showing the consumer's name and surname, identity document series and number, telephone and e-mail (Decision 76-N, Annex 3, point 1(1)).

Entry documents

Foreigners enter on a valid passport plus a visa or residence document unless the law or a treaty provides otherwise (Law on Foreigners, art. 6). Visa-free visitors may stay up to 180 days in a year (art. 7).

Inbound tour operators are exempt from the consumer contract register (Decision 76-N, Annex 3, point 2).

4 Identity verification and onboarding

No Armenian travel rule prescribes a verification method, an identity assurance level or liveness testing. The rules fix only the data to be recorded: identity document series and number for tour package customers, and guest data for the hotel register.

Under Government Decision 884-N of 22 June 2006 (Border Electronic Management Information System), international carriers and passenger handling services supply passenger data at planning, change and execution of a flight: name, sex, citizenship, date of birth and, depending on the border crossing point, an electronic image of the travel document and the result of comparing the passenger's biometrics at boarding with those in the document (section II, point 2). Before departure, international carriers also send advance passenger information: document type, number, issuing state and validity, identity data, traveller status, route points and the passenger's reservation identifier (point 4).

Biometric matching by a private business (for example selfie check-in) is lawful only with the guest's consent unless a law provides otherwise (Law on Protection of Personal Data, art. 13), and no travel law provides otherwise. Before starting, the business must notify the Agency of its intention to process biometric data; this notification is mandatory (art. 23(3)).

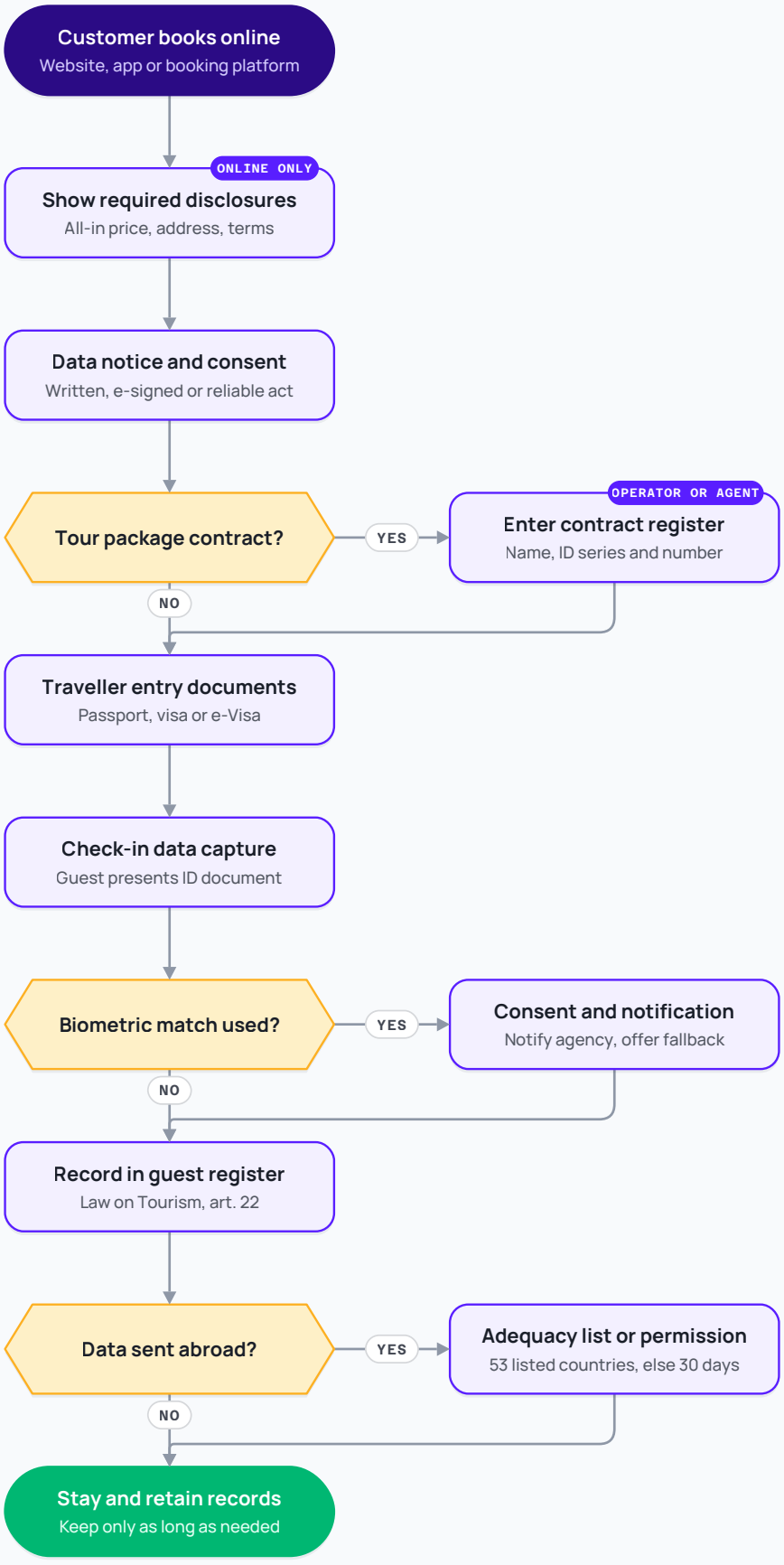


Figure 1. Online booking and contactless check-in for an Armenian hotel or tour operator.

5 Digital channels: what's different

Bottom line: identity and registration duties are channel-neutral, but selling online adds disclosure duties: a set website for tour operators and mandatory content in hotel listings on booking platforms.

Requirement	In person / land-based	Online / remote	Difference
Authorisation to trade	Notification before starting	Same notification; filed on the Tourism Committee platform	Same
Customer identity data (tour packages)	Name, ID series and number in contract register	Same data, same register	Same
Hotel guest register	Required for every guest	Required regardless of booking channel	Same
Website or listing content	Type, name and class sign shown at the property	Type and name, plus all-in price, address, check-in and self check-in options in listings, with terms (including data handling) shown or linked; Armenian-language website for tour operators	Differs
Concluding the contract	Written contract	Online application with operator approval, or electronic signature	Differs
Consent to data processing	Written, or oral shown by reliable actions	Electronic consent must be certified with an electronic digital signature	Differs
Biometric data	Consent and prior notification to the Agency	Consent and prior notification to the Agency	Same
Right to withdraw (hotel bookings)	None	14 days for distance contracts from 1 July 2026, subject to exceptions; tour packages excluded	Differs

Visa for the traveller	Visa issued under the Law on Foreigners (art. 8)	e-Visa issued by the Ministry of Foreign Affairs and International Trade, normally in 3 working days	`Differs`

Tour operator websites

A tour operator that provides, sells or offers services online must run a constantly updated website that is available in Armenian, shows the date each page was updated, gives the operator's trade name, tax registration address, taxpayer number, bank details, office address and management, separates inbound, outbound and domestic offers, allows online contract applications or electronic signature, posts the standard outbound package contract and links to the state complaints page (Decision 76-N, Annex 1).

Hotel listings on booking platforms

Government Decision 1613-N of 10 October 2024, made under article 21 of the Law on Tourism, sets what hotel service providers must publish on online platforms: dates, price, check-in and check-out times, whether self check-in is possible, room conditions, accessibility, the property address and a label on any AI-generated images (point 11). Advertised prices must include all mandatory taxes and charges (point 12), and listings must be updated within three working days of a change (point 10). Published terms must cover cancellation, refunds and guest data handling (point 14), misleading reviews are banned (point 13), and the operator's legal and tax details are owed to a guest on request (point 16). The rules also cover private hosts letting aparthotels, tourist houses and guesthouses.

Electronic consent

Consent is given in writing, or electronically certified with an electronic digital signature; oral consent counts only through reliable actions that clearly show it (Law on Protection of Personal Data, art. 9(7)), and the controller must prove it (art. 9(8)). A tick-box alone may therefore not meet the standard where processing rests on consent. Data recorded because a law requires it, such as the guest and contract registers, can be processed without consent (art. 9(5)).

Distance contracts and withdrawal

A new chapter on distance and off-premises contracts in the Law on Consumer Rights Protection `In force from 1 Jul 2026` gives consumers 14 days to withdraw from a distance contract for services, extended by up to 12 months if they were not told of the right (arts. 24.4-24.5). Tour package contracts and passenger transport contracts are excluded from

the chapter, except that online transport sales must give key pre-order information before the customer commits to pay (arts. 2(3) and 24.3(2)). For hotel bookings the position is unsettled: accommodation is not named in the exceptions, but the exception for leisure-related services with a fixed performance date (art. 24.9(1)(3)) may be read to cover dated stays.

6 Data protection and biometrics

The Law on Protection of Personal Data («Անձնական տվյալների պաշտպանության մասին», HO-49-N, last amended 7 May 2026) applies to every booking and check-in. Four provisions matter most for travel businesses:

- **Biometrics.** Biometric data (physical, physiological and biological characteristics) may be processed only with consent unless a law provides otherwise and the aim can be achieved only through those data (art. 13). A face match at check-in therefore needs consent, given by the legal representative for guests under 16 (art. 9(9)).
- **Prior notification.** Anyone intending to process biometric data must notify the Agency in advance (mandatory), stating purpose, data, legal basis and security measures (art. 23(3)-(4)). The Agency reminded processors of this duty on 8 February 2024.
- **Retention.** Data processed on consent are kept for the period objectively needed for the purpose or the period stated in the consent (art. 9(2)). Hotels must also publish, in their booking terms, how guest data is collected and destroyed and how accounts are deleted, with timelines (Decision 1613-N, point 14(6)).
- **Transfers abroad.** Guest data may go without permission to a country covered by a treaty or on the Agency's adequacy list, which names 53 countries including the EU member states, the United Kingdom, Georgia, Russia and the United States (organisations) (Decision ATPP-001/24 («ԱՏՊՊ-001/24») of 8 July 2024; restated unchanged by Decision ATPG-001/26 («ԱՏՊԳ-001/26») of 18 June 2026). Otherwise the controller must apply in writing to the authorised body, which decides within 30 days (art. 27). This matters for property-management systems hosted abroad.

No travel rule sets a retention period for the guest or contract registers, so the general limit applies.

7 Sector-specific obligations

Passenger data at the border

Airlines and handling agents feed the National Security Service's border system as described in section 4 (Decision 884-N). During a public health event the border sanitary quarantine points may require passengers from affected areas to complete passenger locator cards, and tour operators and airlines are part of the contact-tracing communication mechanism (Decision 219-N of 3 February 2011, amended 2024).

e-Visa and entry

The Ministry of Foreign Affairs and International Trade issues electronic entry visas under article 8(4) of the Law on Foreigners. The e-Visa portal offers visitor visas for stays of up to 21 days (USD 8) and up to 120 days (USD 39); processing is normally three working days, fees are non-refundable and refusal grounds are those of the Law on Foreigners (e-Visa Terms and Conditions).

Qualification of guides and tourist buses

Tour guides now need a qualification certificate under Government Decision 383-N of 26 March 2026 `In force from 1 Sep 2026`, and tourist buses under Decision 1765-N of 4 December 2025 `In force from 1 Apr 2026`. Hotel classification is voluntary (Law on Tourism, art. 13(2)) and is granted by a selected association of tourism providers (Decision 1380-N of 25 September 2025).

8 Risk indicators and red flags

IDENTITY AND COMPLIANCE RED FLAGS IN ARMENIAN TRAVEL

- **Unregistered seller**: an operator, agent or host missing from the Tourism Committee's public register.
- **Misleading listing**: a hotel or guesthouse listing without the all-in price or address required by Decision 1613-N, or with unlabelled AI images or planted reviews.
- **Hotel used as a fraud base**: many foreign guests working from rooms under one organiser who holds their passports; in October 2026 police uncovered a computer-fraud operation run by trafficked foreigners from a Yerevan hotel (Police, 22 October 2026).
- **Document mismatch**: name or document number at check-in differs from the booking or contract register entry.
- **Unbacked outbound sales**: outbound packages sold by an agent that is neither a notified tour operator nor acting for one.
- **Currency exchange at reception**: exchanging foreign currency for guests, which brings the business within the AML law.
- **Unnotified biometrics**: face capture at check-in with no consent record or no prior notification to the Agency, which actively monitors biometric processors.
- **Offshore guest data**: guest records stored in a country outside the adequacy list without the authority's permission.

9 Enforcement and penalties

Fines are set in the Code of Administrative Offences as multiples of a calculation base of AMD 1,000 (Law on Minimum Monthly Wage, art. 3), a base that does not apply to the Criminal Code. Tourism fines are imposed by the Market Surveillance Inspection Body; for tour-package contract breaches and the residual offence, the Tourism Committee examines the case and passes its protocol to the Inspection Body (art. 244.7).

Breach	Provision	Fine

Trading without notification	Art. 169	AMD 15,000-30,000, plus the state duty as damage
Tour package without a contract, or missing mandatory terms	Art. 171.12(1)	AMD 50,000
Hotel without internal rules, or not collecting the information required by the Law on Tourism	Art. 171.12(3)	AMD 100,000
Hotel information not displayed at the property	Art. 171.12(4)	AMD 20,000
Other breaches of the Law on Tourism	Art. 171.12(13)	AMD 10,000
Unlawful collection, storage, use or transfer of personal data	Art. 189.17(1)	AMD 200,000-500,000
Failure to notify the data protection authority	Art. 189.17(4)	AMD 50,000-100,000
Breach of storage requirements for biometric data	Art. 189.17(6)	AMD 100,000-200,000

A data protection offender escapes liability if it remedies the breach within the Agency's deadline (art. 189.17(8)). Trading without notification that causes large-scale damage is a crime punishable by up to three years' imprisonment (Criminal Code, art. 281). The right to carry on a notified activity can also be suspended or terminated (Notification Law, arts. 18-20), and such decisions are published in the Tourism Committee register (Decision 136-N, Annex 1, point 3(8)).

The Personal Data Protection Agency reported in April 2024 that monitoring of biometric and special-category processors led to more than ten proceedings in the first quarter of 2024 and fines on eight organisations.

10 Recent changes and what to watch

- **1 November 2026** `In force`: residence status applications move to a unified electronic platform of the Migration and Citizenship Service; earlier online booking channels closed.
- **1 September 2026** `In force`: qualification of tour guides and escorts (Decision 383-N).

- **1 July 2026** In force: electronic register of tourism service providers (Decision 136-N). Brand names used online must be declared.
- **1 July 2026** In force: distance-contract rules and 14-day withdrawal right in the Law on Consumer Rights Protection (HO-178-N).
- **1 April 2026** In force: qualification of tourist buses (Decision 1765-N).
- **30 June 2025** In force: statutory guest register for hotel service providers (Law on Tourism, art. 22).
- **Pending**: the outbound-tour guarantee act (Law on Tourism, art. 15(6)), overdue since September 2024; a 2024 bill to extend the deadline Proposed has not been enacted. Outbound sellers should budget for the guarantee.
- **Pending**: the Minister of Economy's order on the hotel guest register procedure (Law on Tourism, art. 22(2)), due since May 2025.

11 What this means for identity verification

- **Capture, not prove.** The rules require identity data but no verification method; document capture with data extraction meets the recording duty.
- **Documents.** Expect foreign passports, Armenian ID cards and passports, and residence documents; visa status is a border matter, not a hotel duty.
- **Biometrics are opt-in.** Face match and liveness need consent and a prior notification to the Agency; design a manual fallback.
- **Consent mechanics.** Rely on the legal duty for register data; use consent only for extras such as biometrics.
- **Self check-in.** Hotel listings must say whether self check-in is possible; the guest register duty still applies to remote and kiosk check-in.
- **Hosting.** Choose data locations on the adequacy list or obtain permission before sending guest data abroad.
- **Currency exchange.** If the property exchanges currency, full AML customer due diligence applies to that service.

IDENTOMAT

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, to record passport and ID card data for guest and contract registers.
- Consent-based biometric liveness and face match for contactless check-in, with a fallback route for guests who decline.
- Phone and email verification and e-signatures for online booking and tour package contracts.
- Cloud, on-premises or hybrid deployment to keep guest data where data protection rules require.
- No-code workflow builder to configure booking and check-in flows per property or channel.

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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