Identomat

COMPLIANCE GUIDE

Travel & Hospitality Compliance in Azerbaijan

COUNTRY Azerbaijan

INDUSTRY Travel & Hospitality

LAST UPDATED 14 November 2026

KEY REGULATORS State Tourism Agency · State Migration Service · State Border Service

Key takeaways

- Hotels, hostels and other places that accommodate guests must register every guest electronically at check-in, using the free Guest Registration Programme run by the State Tourism Agency. Failing to do so carries a fine of AZN 200, rising to AZN 500 for a repeat within a year.
- Registration is built on the guest's identity document (passport, ID card or, for foreign visitors, the travel document plus visa details). Accommodation providers must keep the registration form and a copy of the document for at least 3 and no more than 6 months. For foreign guests staying more than 15 days, the hotel must also file a registration with the State Migration Service; a company that breaches these rules faces fines of AZN 2,000 to 3,000.
- Hotels and travel companies are not covered by Azerbaijan's anti-money laundering law (the AML/CFT Law), so there is no customer due diligence duty for room or package sales. Licensed currency exchange is the exception, and every business must freeze assets of persons on the national and UN sanctions lists.
- Online sales do not change the guest registration duty: it still happens at check-in. The biggest digital difference is at the border, where foreign visitors who need a visa can obtain an electronic visa (ASAN Visa) online in 3 working days, or 3 hours for an urgent visa.
- Collecting face images or other biometrics, for example for contactless check-in, falls fully under the Law on Personal Data and generally needs the guest's written or e-signed consent. A new "digital traveller" business visa for remote workers applies from 1 January 2027.

Azerbaijan is open to online travel and hospitality businesses: there is no separate licence for online booking, and the sector sits outside the AML regime. Identity obligations come instead from tourism, migration and aviation law, and they are concrete and electronic by design.

The principal authorities are the State Tourism Agency (guest registration, the Tourism Register, hotel star categories), the State Migration Service (registration of foreign guests staying more than 15 days) and the State Border Service (advance passenger data from airlines).

The main practical obstacle for a new entrant is integration: guest data must pass through state systems (the Guest Registration Programme, the Tourism Register and, for longer foreign stays, the State Migration Service), so a booking or check-in product has to fit those government channels rather than replace them.

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1 Who regulates this sector

Authority	Remit in travel and hospitality	Level	Official site
State Tourism Agency	Law on Tourism; Tourism Register; Guest Registration Programme and supervision of electronic guest registration	National	tourism.gov.az
State Migration Service	Registration of foreigners at their place of stay; Unified Migration Information System	National	migration.gov.az
Ministry of Foreign Affairs	Approves the list of countries whose citizens may obtain an electronic visa	National	mfa.gov.az
ASAN Visa system	Issues electronic visas online; the portal is operated by the State Agency for Public Service and Social Innovations	National	evisa.gov.az
State Border Service	Operates the information system behind the passenger data "single window" for airlines	National	dsx.gov.az

Ministry of Digital Development and Transport, through its National Cybersecurity Agency	Personal data authority; the Agency keeps the state register of personal data information systems, handles personal data complaints and takes administrative offence measures	National	Charter on president.az
Central Bank of the Republic of Azerbaijan (CBAR)	AML supervisor of financial institutions, including licensed currency exchange	National	cbar.az
Financial Monitoring Service	Financial intelligence unit; receives notifications of frozen assets under targeted financial sanctions	National	fiu.gov.az

2 Licensing and authorisation

The **Law of the Republic of Azerbaijan "On Tourism"** (No 448-VIQ of 27 December 2021) sets conduct and registration duties rather than a licensing regime. The State Tourism Agency confirms that no special permission (licence) is required for hotel or tourism activity, and that opening a tourism company requires only tax registration (a taxpayer identification number, VÖEN).

Hotels and other accommodation

"Accommodation facilities" are hotels, hotel-type establishments and any other premises offering paid temporary accommodation (art. 1.1.20), so guest houses, hostels and paid short-term rentals fall within the guest registration duty described in section 4. A "hotel" is a facility with a reception desk, rooms with bathrooms, at least one meal a day and at least 11 rooms (art. 1.1.21).

Every hotel operating in Azerbaijan must obtain a star category within 6 months of starting operations, assessed by conformity assessment bodies accredited under the law on accreditation (Law on Tourism, art. 9.1). The hotel must enter its star category in the Tourism Register within 15 days of it being set, and update any changed register data within 15 days (art. 13.3 and 13.4). Operating without a star category is fined AZN 2,000 to 5,000.

Tour operators and travel agents

Tour operators and travel agents must sell under a written contract listing services, prices, dates, cancellation terms and insurance, read in the consumer's favour where unclear (art. 8.1). They must hold civil liability insurance (art. 8.2), give paying customers a tour document (turizm yollayışı) that forms part of the contract (art. 8.3), and enter their insurance details in the Tourism Register within 15 days of starting business (art. 13.2). Selling a package without liability insurance is fined AZN 1,000 for individuals and AZN 2,000 for legal entities.

3 Identity framework (AML rules do not apply)

The **Law on the Prevention of the Legalization of Criminally Obtained Property and the Financing of Terrorism** (No 781-VIQ of 30 December 2022; the AML/CFT Law) lists its obliged entities exhaustively. Neither the financial institutions (art. 1.1.8) nor the non-financial businesses and professions (art. 1.1.9) include travel: hotels, tour operators, travel agents, online travel agencies and airlines are absent, so they have no statutory customer due diligence, suspicious transaction reporting or record-keeping duties under the AML/CFT Law.

Two exceptions matter to travel businesses:

Currency exchange

A licensed exchange desk, for example in a hotel or airport, is a financial institution supervised by CBAR (AML/CFT Law, art. 16.1.1) and applies due diligence to occasional transactions of AZN 20,000 or more, including linked ones (art. 4.2.2).

Targeted financial sanctions

The Law on Targeted Financial Sanctions (No 782-VIQ) binds every person and entity in Azerbaijan: assets of designated persons must be frozen without delay or notice once listed on the sanctions information resource, and the freeze reported immediately through it (art. 5.1).

Identity is governed instead by guest registration (Law on Tourism, art. 9.2), registration of foreigners under the **Migration Code of the Republic of Azerbaijan** (art. 21) and airline passenger data rules.

4 Identity verification and onboarding

Electronic guest registration

Article 9.2 of the Law on Tourism requires every accommodation provider to register its guests electronically. The procedure is set by the **Rules on Electronic Registration of Persons Using Accommodation Services**, approved by Cabinet of Ministers Decision No 86 of 17 March 2023 and last amended by Decision No 361 of 27 October 2026:

- The State Tourism Agency provides the Guest Registration Programme free of charge (rule 1.5).
- Management appoints one or more responsible employees through its account in the Tourism Register (rule 2.2). The responsible person logs in through the E-Government Information System (EGIS) single sign-on (Vahid Giriş), operated as mygov ID, and completes the guest form at check-in on the basis of the guest's identity or border-crossing document (rules 2.1 and 2.3).
- The Tourism Register checks the data against other state systems where they exist (rule 2.4), then stores them anonymised under a unique registration number (rule 2.5); check-out changes must be updated (rule 2.6).
- If the programme fails, the Agency must be told by the end of the arrival day (rule 2.8).

The form (annex to the rules) records the guest's full name, date of birth and sex. For citizens, permanent residents and recognised refugees it records the ID card series and number or the passport number (a birth certificate for children under 15 without an ID card). For foreigners in temporary stay it records the border-crossing document number, citizenship, country of residence, country of departure, date of entry and the visa number, validity and permitted stay.

Foreign guests staying more than 15 days

Foreigners and stateless persons staying temporarily for more than 15 days must be registered at their place of stay (Migration Code, art. 21.1). The "receiving party" (hotel or similar management, or the owner of a private dwelling) must submit an application form and a copy of the guest's passport or other travel document to the State Migration Service within 15 days of the guest's arrival in Azerbaijan, through the Service's online resource, by email or in person (art. 21.2). The Service registers the guest immediately in the Unified Migration Information System and confirms within 1 working day (art. 21.4). Registration runs for the stay shown on the visa, or 90 days for visa-free visitors (art. 21.5), carries no state fee (art. 21.7) and must be repeated within 5 working days when the guest moves to a new place of stay (art. 21.9). On departure, the receiving party or the guest notifies the

Service (art. 21.8). Businesses that receive foreigners are themselves liable for breaches (Code of Administrative Offences, art. 575.3).

Biometrics and liveness

No rule requires hotels or travel sellers to capture biometrics or run liveness checks; biometrics appear only on the state side: visa forms carry a facial image meeting biometric identification requirements (Migration Code, art. 35.1), migration records include document biometrics where available (art. 8.1.1), and airport border control uses automated document checks (Rules on Facilitation of Air Transport Formalities, rule 4.3).

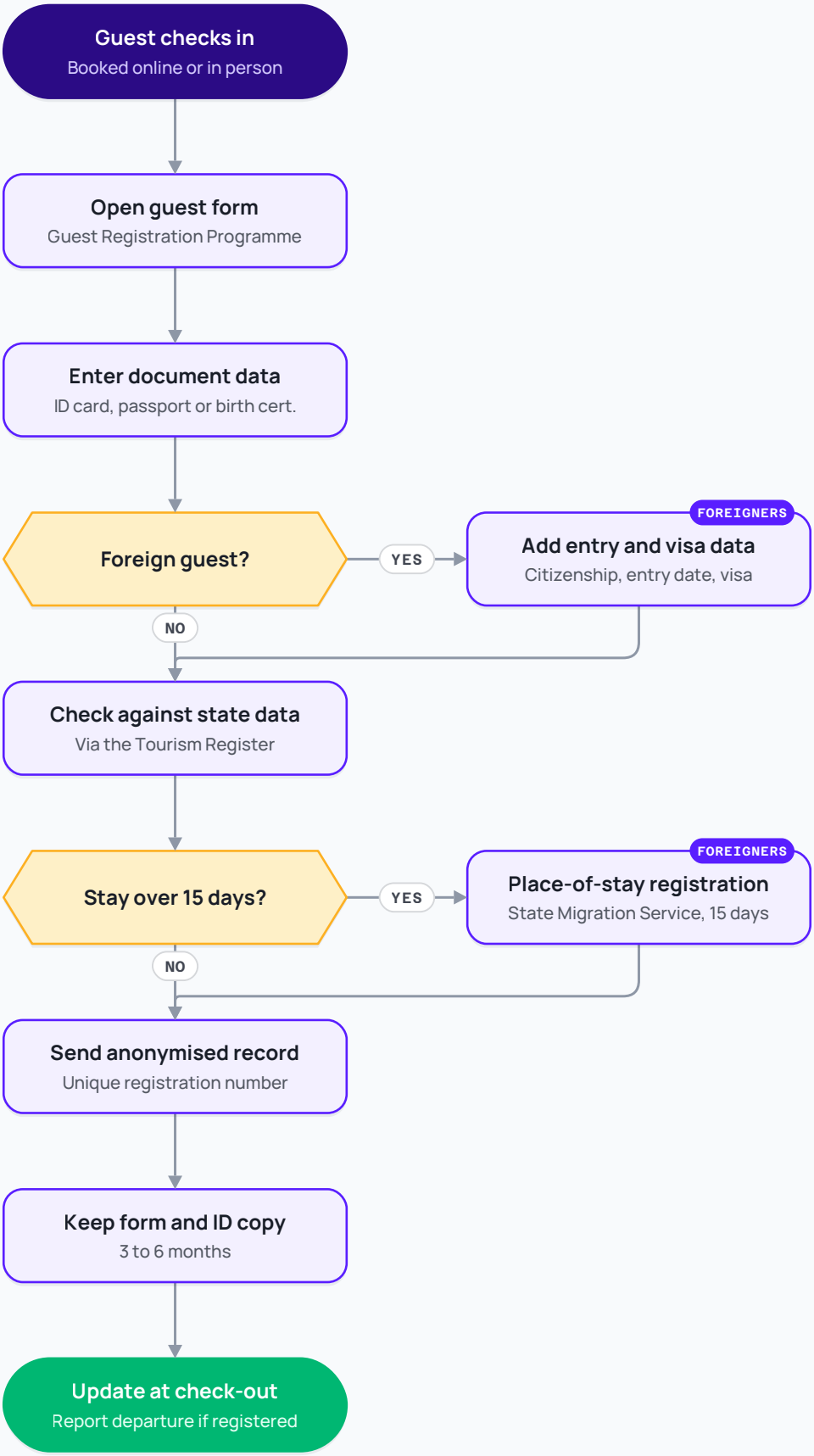


Figure 1. Electronic guest registration at an Azerbaijani accommodation provider, with the additional step for foreign guests staying more than 15 days.

5 Digital channels: what's different

Bottom line: the hospitality rules are channel-neutral (a guest booked online is still registered at check-in through the state programme), but the border is digital-first: visitors who need a visa can obtain it online through ASAN Visa, and the visa details are among the data hotels later record.

Requirement	In person / land-based	Online / remote	Difference
When the guest is registered	At check-in	At check-in, not at booking	Same
How the guest is registered	Electronically, in the Guest Registration Programme	Electronically, in the Guest Registration Programme	Same
Visa for eligible foreigners	Visa through a diplomatic mission, with application form and documents (Migration Code, art. 36)	ASAN Visa e-visa with passport photo-page scan; 3 working days, urgent 3 hours, family and group applications	Differs
Place-of-stay registration (over 15 days)	Receiving party files at the State Migration Service	Receiving party files through the Service's online resource or by email	Same
Tour package contract and tour document	Written contract and tour document	Written contract and tour document	Same
Biometric capture	Not required	Not required; if used, full personal data rules and consent apply	Differs
Retention of document copies	3 to 6 months	3 to 6 months	Same
Systems holding guest data	State registration of personal data systems	State registration of personal data systems	Same

The e-visa sets the identity baseline

Under Migration Code art. 38, foreigners from countries on the Ministry of Foreign Affairs list may obtain an electronic visa through ASAN Visa, with a stay of up to 30 days on a single-entry and up to 90 days on a multiple-entry visa. In practice the portal currently offers direct applicants a single-entry visa valid for 90 days with a 30-day stay; the State Programme on tourism development for 2026 to 2030 schedules improvements to multiple-entry tourist e-visa issuance for 2026 and 2027. Applications are checked in real time against the interagency entry-exit system (art. 38.5 and 38.6). The passport must remain valid 3 months beyond the visa, and the visa is invalid if the traveller uses a different travel document from the one used to apply. Families of up to 10 and groups of up to 300 can apply together.

Contactless check-in and biometrics

Document data can be processed because the law requires registration (Law on Personal Data, art. 9.6.2), but a selfie or face match is required by no rule, so it needs consent in writing, including an electronic document with an enhanced electronic signature (art. 8.1).

6 Data protection and biometrics

The **Law on Personal Data** (No 998-IIIQ) is the general regime. Four of its rules bite directly on guest identity data:

- **Registered systems.** Personal data information systems must be state-registered before data are collected, and processing in an unregistered system is not allowed (art. 15.1 and 15.2); registration takes up to 1 month on written application (art. 15.4), with exemptions set by purpose and number of data subjects (art. 15.3.3). Since Presidential Decree No 676 of 2 June 2026, the Ministry of Digital Development and Transport remains the authority (Presidential Decree No 361 of 13 December 2010), and its National Cybersecurity Agency, created on the basis of the Electronic Security Service, keeps the state register of personal data systems and examines complaints (Charter, 3.1.24 and 3.1.25).
- **Consent or legal basis.** Processing needs consent or another listed ground, such as legislation setting its purpose (art. 9.6); registration data must be used in line with the personal data and commercial secrets laws (rule 3.1).
- **Biometrics.** Fingerprints, facial images, iris data, voice and signatures are covered in full (art. 9.5).

- **Transfers abroad.** Transfer is prohibited where it threatens national security or the recipient country lacks equivalent protection, unless the data subject consents or life and health are at stake (art. 14.2 and 14.3).

Retention is fixed for registration: forms and copies of identity or travel documents must be kept for no less than 3 and no more than 6 months (rule 2.7). More generally, data must be destroyed without delay once the purpose is achieved (art. 9.4). Failure to protect personal data, to destroy it when the law requires, or using an unregistered system is fined AZN 300 to 500 under the Code of Administrative Offences (art. 375).

7 Sector-specific obligations

Advance passenger information and passenger name records

Cabinet of Ministers Decision No 104 of 9 April 2025, adopted under the Law on Aviation (No 1058-VIQ of 22 December 2023, art. 46.2), requires the operators of every flight landing in or leaving Azerbaijan to push passenger data to the passenger data "single window", run on the State Border Service's information system. Advance passenger information (travel document data, citizenship, date of birth, sex, seat and baggage) is sent 30 minutes before departure and again after take-off. Passenger name records follow 72, 48, 24, 12 and 1 hour before departure, with contact, ticket, payment and itinerary data and the travel agent's details and IATA code. Both pass in real time to the interior, customs and security authorities. Air tickets themselves are issued on the basis of an identity document, or a border-crossing document for international carriage, on paper or electronically (Rules on Commercial Air Carriage, Cabinet Decision No 30 of 19 February 2025, rule 3.1), so a seller that issues tickets needs the traveller's document data at booking.

8 Risk indicators and red flags

IDENTITY AND COMPLIANCE INDICATORS FOR ACCOMMODATION AND TRAVEL PROVIDERS

- **Document mismatch**: the travel document shown at check-in differs from the one used for the e-visa, which makes the e-visa invalid.
- **State data conflict**: guest form details fail Tourism Register verification.
- **Overstay**: a stay runs past the period allowed by the visa or the visa-free regime.
- **Unregistered long stay**: a foreign guest passes 15 days without place-of-stay registration.
- **Sanctions match**: a guest or payer matches a listing on the targeted financial sanctions information resource.
- **Forged or borrowed documents**: a document appears altered or belongs to someone else.
- **Data outside registered systems**: guest document copies kept in unregistered tools.

9 Enforcement and penalties

Penalties are fines per violation, fixed or within a range, under the **Code of the Republic of Azerbaijan on Administrative Offences**, with a higher fine for repeat guest registration and register offences within a year. The Law on Tourism refers liability to the Civil, Administrative Offences and Criminal Codes (art. 21).

Violation	Provision	Fine
Failure to register guests electronically	Art. 428-1.4	AZN 200
Repeat of guest registration or Tourism Register violation within one year	Art. 428-1.5	AZN 500
Missing or late Tourism Register data	Art. 428-1.3	AZN 300

Hotel operating without a star category	Art. 428-1.2	AZN 2,000 to 5,000
Selling a tour package without liability insurance	Art. 428-1.1	AZN 1,000 (individuals); AZN 2,000 (legal entities)
Business receiving foreigners breaching registration or deregistration rules	Art. 575.3	AZN 300 to 500 (officials); AZN 2,000 to 3,000 (legal entities)
Private host failing to register or deregister a foreign guest	Art. 577	AZN 300 to 500
Personal data breaches (unregistered system, failure to protect or destroy data)	Art. 375	AZN 300 to 500

Foreign guests who overstay or are not registered are fined AZN 300 to 400, with or without administrative expulsion (art. 575.1).

Breaches of the hotel's registration duty can reach the courts on a protocol drawn up by the State Migration Service. In a decision of 16 June 2023 (case No 3(006)-2563/2023), the Nasimi District Court in Baku (published on the Unified Court Portal, courts.gov.az) fined the company operating a Baku hotel AZN 2,000 under art. 575.3 because three foreign guests had not been registered at their place of stay within the 15-day period.

10 Recent changes and what to watch

- **1 January 2027**: `Adopted, effective 1 Jan 2027` Law No 476-VIIQD of 30 September 2026 adds the "digital traveller" to the Migration Code: a remote worker in digital technology, AI, cybersecurity or innovation with foreign income, eligible for a business visa (stay of up to 180 days) on proof of average monthly income of at least 13 times the minimum monthly wage over 6 months, which means longer stays that trigger place-of-stay registration.
- **27 October 2026**: `In force` Cabinet Decision No 361 moved the guest registration login to the EGIS single sign-on (Vahid Giriş), operated as mygov ID.
- **20 August 2026**: `Amendments in preparation` Presidential Order No 1182 approved the State Programme on tourism development for 2026 to 2030, planning a better Tourism Register, wider e-visa coverage and multiple-entry tourist e-visas; Cabinet Order No 639s requires the State Tourism Agency to submit proposals to improve the Law on Tourism by 20 December 2026.

- **14 July 2026**: `In force` Law No 465-VIIQD made stay-extension decisions electronic, delivered to the applicant's e-government account and email.
- **2 June 2026**: `In force` Presidential Decree No 676 created the National Cybersecurity Agency under the Ministry of Digital Development and Transport, on the basis of the Electronic Security Service, to keep the personal data systems register and examine complaints.
- **4 March 2026**: `In force` Presidential Decree No 611 approved the Rules on Facilitation of Air Transport Formalities, covering the passenger data "single window", ASAN Visa and automated border document checks.
- **9 April 2025**: `In force` Cabinet Decision No 104 replaced the 2019 passenger data rules with the "single window" for advance passenger information and passenger name records, including travel agent details.

11 What this means for identity verification

- **Documents**: design capture around the Azerbaijani ID card, passports and, for foreigners, the visa record; children under 15 may present a birth certificate.
- **Data fields**: for foreign guests capture the visa and entry fields the state form requires.
- **Integration over replacement**: a check-in product must feed the Guest Registration Programme through the provider's responsible person; it cannot substitute its own verification for state registration.
- **Biometrics by consent**: face matching for contactless check-in needs written or enhanced e-signature consent, a registered information system and a lawful route for any transfer abroad.
- **Re-verification triggers**: a change of check-out date, a stay passing 15 days and a move to a new place of stay each create a new registration step.

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 of e-passports, to pre-fill the data the state guest registration form requires.
- Face match and biometric liveness for contactless check-in, with consent captured through e-signatures.
- AML screening against sanctions lists at booking and check-in, supporting targeted financial sanctions freeze duties.
- Configurable no-code workflows with retention settings that match the 3 to 6 month limit for guest document copies.
- Cloud, on-premises or hybrid deployment to keep guest data in registered systems and manage cross-border transfers.

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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