



# AI in Tourism – Legal Challenges & Compliance

NATALIJA BABIĆ, Attorney-at-law

[natalija.babic@ounb.hr](mailto:natalija.babic@ounb.hr)

[www.ounb.hr](http://www.ounb.hr)

# Why legal (and) compliance matter?



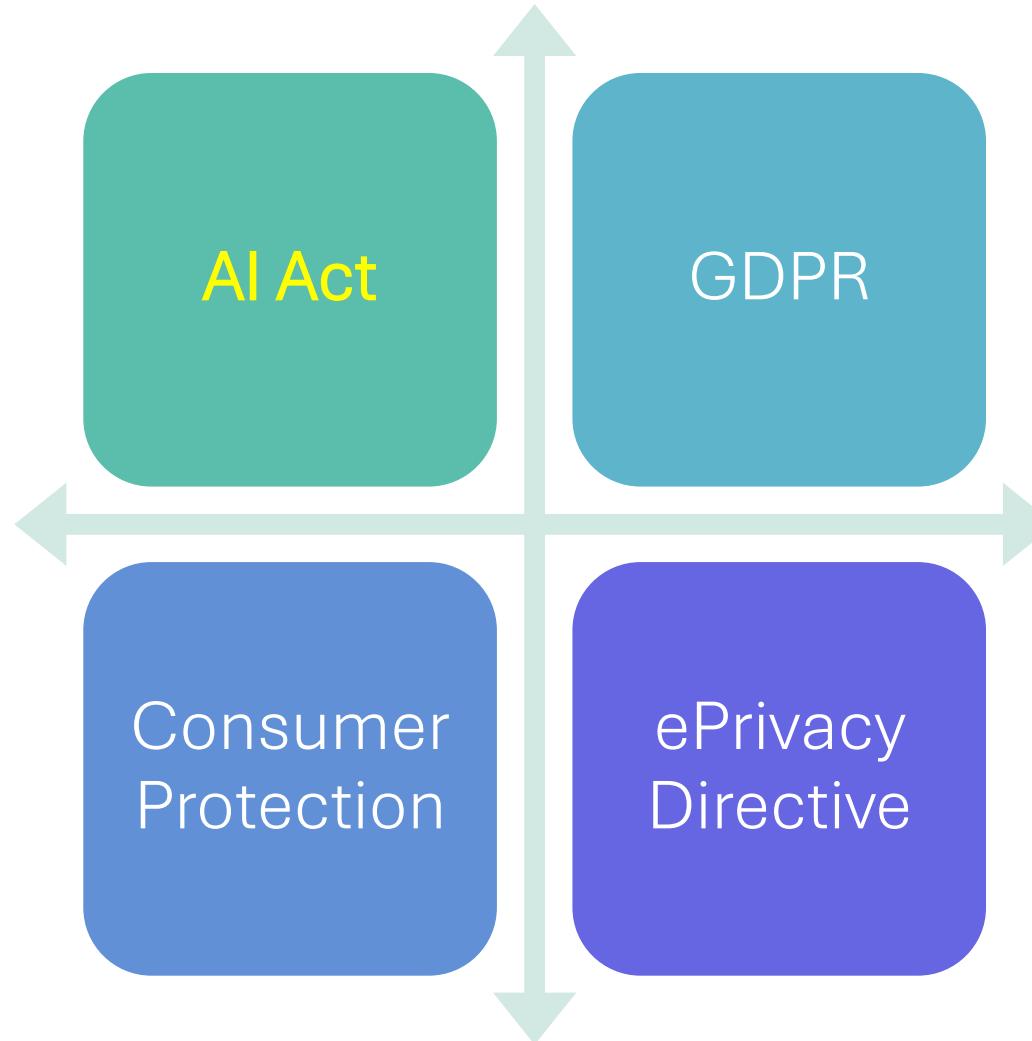
Ensuring **fair** and **transparent** AI use.

Protection of **regulatory framework** (privacy rights, data protection rights, anti-discrimination rights, etc.).

Maintaining competitive **fairness**.

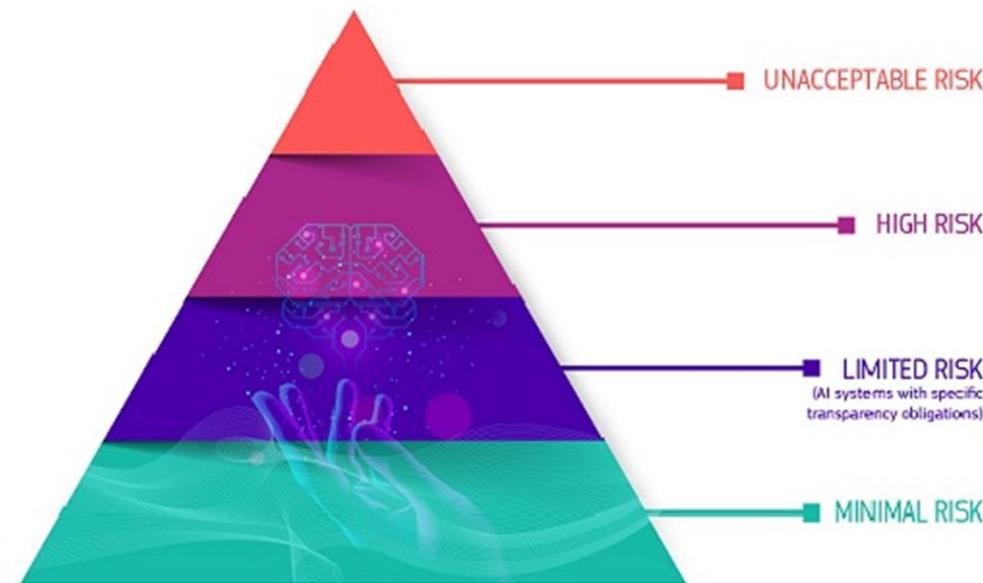
Building of **trust** in the industry.

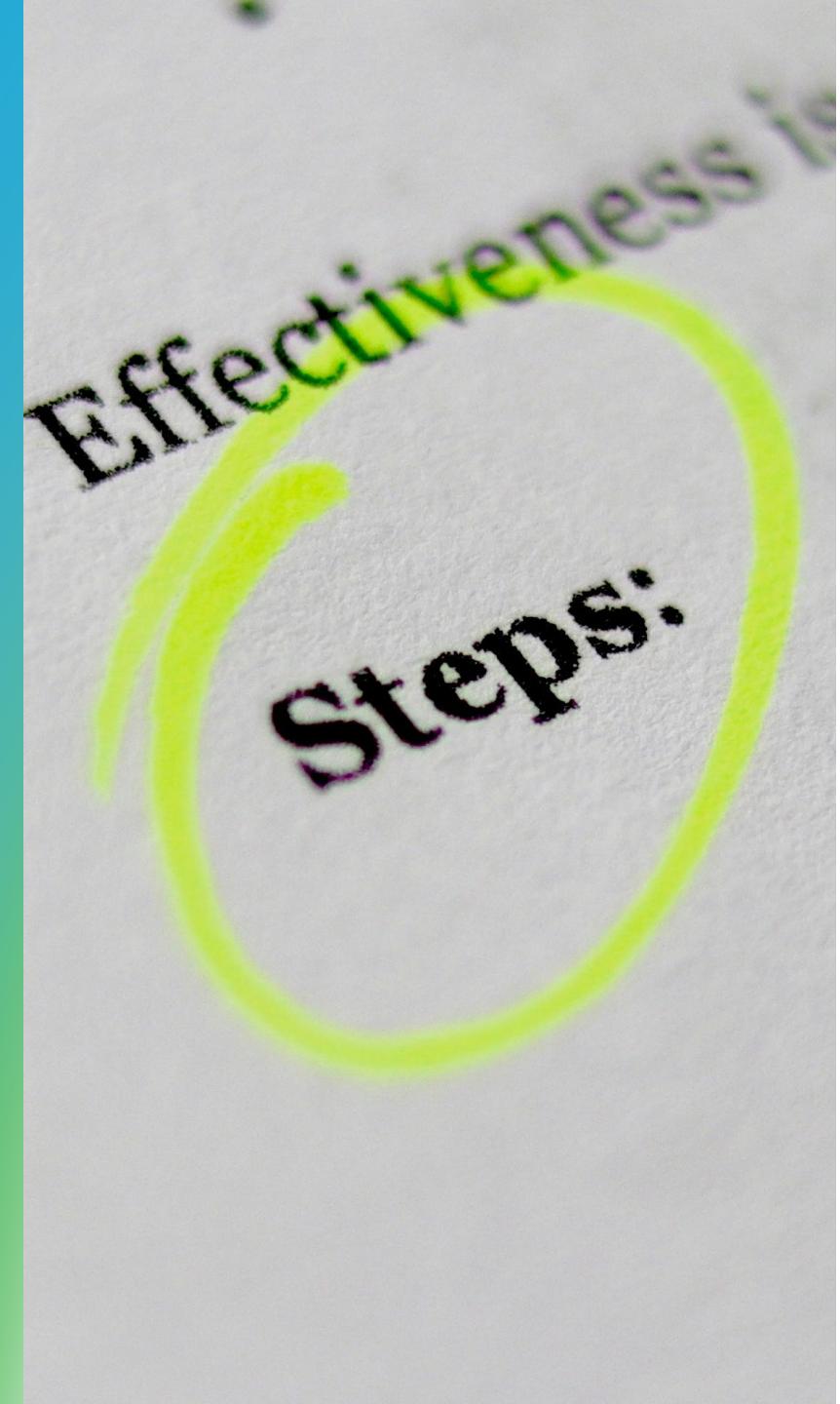
# Regulatory framework



# AI Act (Regulation (EU) 2024/1689 laying down harmonised rules on artificial intelligence)

- Gradual implementation expected started in 2024, with full effect by 2027;
- AI tools like virtual assistants or chatbots - usually **limited risk**;
- **Transparency obligation** – inform the users;
- High risk systems, e.g. biometric facial recognition – strict compliance, impact assessments, human oversight, technical documentation and record keeping;
- Non-compliance triggers serious **fines up to 6% of global annual turnover**.





# AI Act compliance steps

## AI system classification

- Classify the risk

## Risk mgmt & impact

- Evaluate the risks and impact systematically

## Transparency & information

- Provide clear AI system usage information

## Human oversight

- Ensure human monitoring and control mechanisms

## Tech docs & records

- Maintain comprehensive AI system operation records

## Data governance

- Ensure data accuracy, relevance, proper mgmt

## Security Measures

- Implement robust cybersecurity and protection protocols

## Compliance Monitoring

- Regular checks and reports on status

## Certification

- For high-risk AI systems, obtain EU conformity certificates

## Contractual Obligation

- Meet all legal and contractual obligations – **start from the beginning!**

# GDPR and ePrivacy Directive

AI-driven **personalization** in tourism relies heavily on personal data – GDPR applies



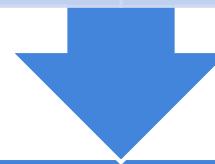
Ensure:

lawful  
processing

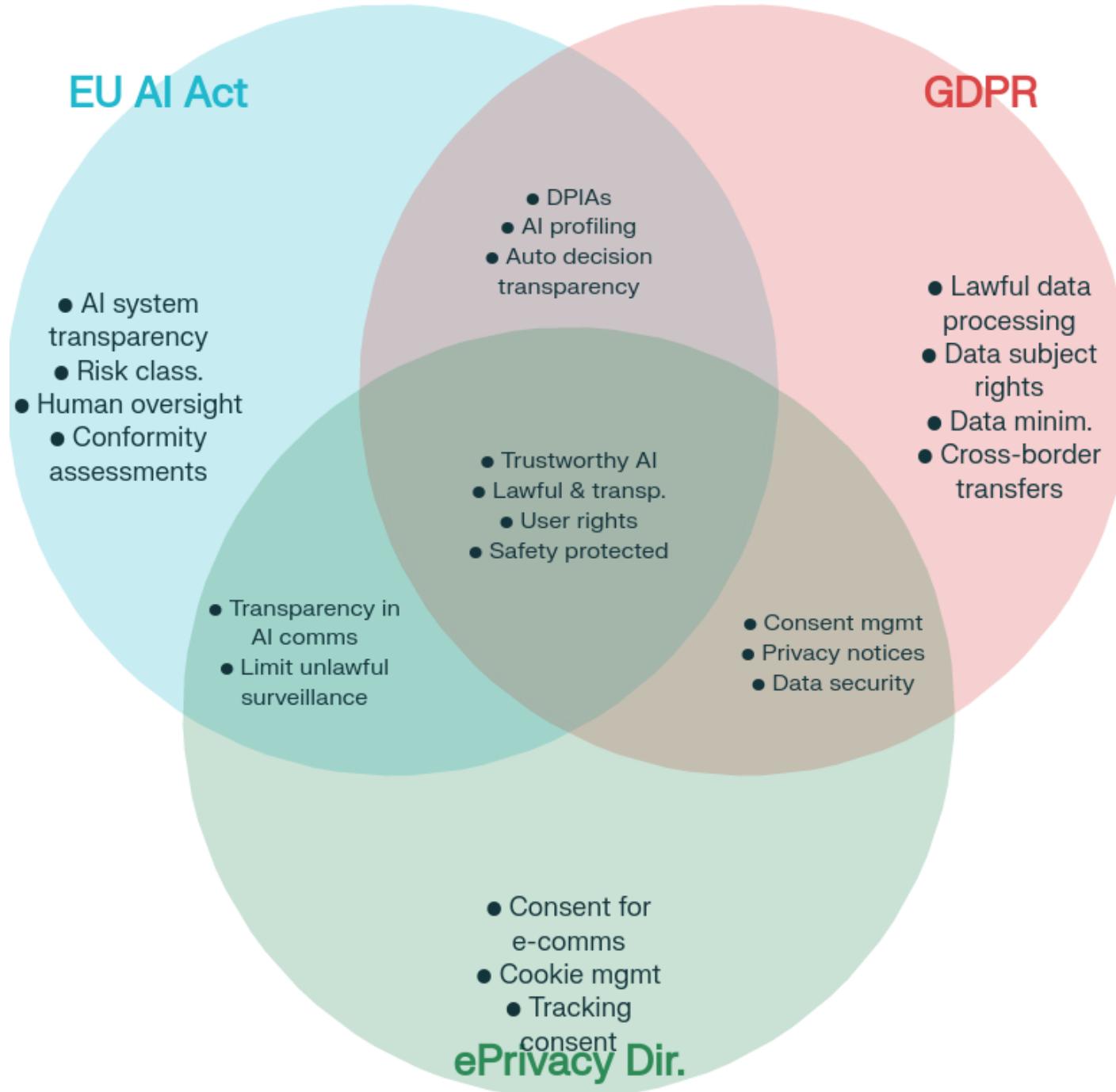
explicit  
consent

data  
minimization

cross-border  
data transfers;



ePrivacy Directive for **electronic communications** (relevant in automated communication like **chatbots**) – ensure transparency about data collection and user consent



“

Success in creating AI would  
be the biggest event in  
human history.

Unfortunately, it might also  
be the last, unless we learn  
how to avoid the risks.

STEPHEN HAWKING

GRACIOUSQUOTES.COM

To sum up...

- AI has the potential to unlock tremendous value for tourism;
- trust & comprehensive compliance as business assets;
- responsible and compliant AI is key to sector growth.

Thanks for your  
attention!



Questions & comments are welcome!

[natalija.babic@ounb.hr](mailto:natalija.babic@ounb.hr)

N A T A L I J A   B A B I Ć

Law office