KRiBSI inspection checklist

For companies using AI in Poland, data protection officers and compliance teams. Tick what you already have; the empty boxes are your tasks.

Dutybound
as of 24 September 2026

28 October 2026
KRiBSI inspections and fines (Art. 127 of the Act)

at least 7 days
from service of the notice to the inspection (Art. 49(2))

remote
without the parties present in person, with exceptions (Art. 49(3)–(4))

14 days
to sign the report or file objections (Art. 56(6))

1. Have ready before the notice arrives

- [ ] AI system register: name, vendor, purpose, business owner, role under the AI Act, risk class; cross-referenced to the GDPR record of processing basis for everything below
- [ ] Named roles: who is responsible for AI, who approves new tools; a contact person for the inspection and a deputy
- [ ] Written AI usage rules (permitted tools, what data may be entered) and signed staff acknowledgements
- [ ] AI training register: who, when, which module, format, quiz result; the training programme Art. 4 AI Act, since 2 Feb 2025
- [ ] A check that no use is a prohibited practice Art. 5 AI Act, since 2 Feb 2025
- [ ] Chatbots say they are AI; synthetic content and deepfakes are labelled; dated screenshots Art. 50 AI Act, since 2 Aug 2026
- [ ] Contracts with AI vendors: documentation, incident reporting, transparency support, access to logs, audit rights
- [ ] An AI incident procedure and an incident log
- [ ] A document index with owner and last-update date, in one place, ready to share electronically within hours
- [ ] A list of material containing trade secrets, with a short justification confidentiality: Art. 50(8)

2. Where GDPR meets it for DPOs

- [ ] A DPIA for AI systems that need one Art. 35 GDPR; for high-risk systems, built on the provider's information Art. 26(9) AI Act
- [ ] Solely automated decisions: legal basis and the data subject's rights Art. 22 GDPR
- [ ] Chatbot: the privacy notice alongside the AI disclosure Art. 13 GDPR
- [ ] The DPO advises and monitors; the business or compliance owns the AI roll-out Art. 38(6) GDPR

3. After the inspection

- [ ] Report: sign it or file written objections within 14 days; no response counts as refusing to sign Art. 56(6) and (8)
- [ ] Post-inspection recommendations: as a rule at least 30 days to fix; a plan with owners Art. 57
- [ ] Review afterwards: what was asked, what was missing, which documents to update

4. The 7 days after the notice

Day 0	Notice to the contact person and your lawyer. Record the date of service and the scope in the authorisation (Art. 51).
Day 1	Compare the scope with the document index and list the gaps. Agree the technical setup of the remote inspection.
Days 2–3	Collect the documents; check the register, classification and contracts agree. Mark trade secrets.
Day 4	Review by your lawyer; prepare the people who will be interviewed.
Day 5	Test the connection and file sharing; read-only accounts.
Day 6	Sign-off by management; the company keeps its own minutes of each session.
Day 7	Inspection: one person speaks, the lawyer attends, every request and every document handed over is logged.

5. Good to know

- The inspector may demand documents, email correspondence and access to systems, including in the vendor's cloud, as far as your own access goes Art. 52
- Correspondence with an advocate or legal adviser is protected Art. 54
- Unclear provision: ask KRiBSI for an individual opinion, PLN 150, 30–60 days, binding on the authorities Art. 8–13

Sources: Act of 3 July 2026 on artificial intelligence systems (Dz.U. 2026 item 1003), cited as "Art." without a name; Regulation (EU) 2024/1689 (AI Act); GDPR. Operational information, not legal advice.

KRiBSI tracker with sources: getdutybound.com/kribsi/ · Dutybound, ARATIR SYSTEMS P.S.A., Radom